

State: Pennsylvania **Filing Company:** Continental Casualty Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other
Product Name: PA-OP-GEN2-RA20-R1
Project Name/Number: PA-OP-GEN2-RA20-R1 (RATE ONLY)/

Filing at a Glance

Company: Continental Casualty Company
Product Name: PA-OP-GEN2-RA20-R1
State: Pennsylvania
TOI: LTC03I Individual Long Term Care
Sub-TOI: LTC03I.003 Other
Filing Type: Rate - Other (Not M.U. or G.I. Product)
Date Submitted: 02/23/2022
SERFF Tr Num: CNAB-133114869
SERFF Status: Closed-Approved
State Tr Num: CNAB-133114869
State Status: Approved
Co Tr Num: PA-OP-GEN2-RA20-R1 (RATE ONLY)
Effective: On Approval
Date Requested:
Author(s): Louis Scarim, John Munro, Mallory Noble, Peter Shugart, Ashley Kushner, Roshni Tantuwaya
Reviewer(s): Michael Hibbert (primary), Jim Laverty
Disposition Date: 08/09/2022
Disposition Status: Approved
Effective Date:

State Filing Description:

Proposed 45.7% rate increase on 2,569 policyholders of forms P1-21295-A37/-A87, P1-21300-A37/-A87, P1-21305-A37/-A87, P1-N0022-A37/-A87/-B37/-B87, P1-N0023-A37/-A87/-B37, P1-N0026-A37/-A87/-B37/-B87, P1-N0027-A37/-A87/-B37, P1-N0030-A37/-A87, P1-N0031-A37/-A87, & P1-N0034-A37/-A87.

State:	Pennsylvania	Filing Company:	Continental Casualty Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.003 Other		
Product Name:	PA-OP-GEN2-RA20-R1		
Project Name/Number:	PA-OP-GEN2-RA20-R1 (RATE ONLY)/		

General Information

Project Name: PA-OP-GEN2-RA20-R1 (RATE ONLY)

Project Number:

Requested Filing Mode: Review & Approval

Explanation for Combination/Other:

Submission Type: New Submission

Overall Rate Impact: 49.7%

Deemer Date:

Submitted By: Peter Shugart

Status of Filing in Domicile: Pending

Date Approved in Domicile:

Domicile Status Comments: This filing was submitted in our state of domicile, Illinois, on 11/5/2021.

Market Type: Individual

Individual Market Type:

Filing Status Changed: 08/09/2022

State Status Changed: 08/09/2022

Created By: Peter Shugart

Corresponding Filing Tracking Number: CNAB-133114868

State TOI: LTC03I Individual Long Term Care

Filing Description:

Please refer to the Cover Letter in the Supporting Documentation tab.

Company and Contact

Filing Contact Information

Louis Scarim,
151 N. Franklin Street
Chicago, IL 60606

Louis.Scarim@cna.com
312-822-6179 [Phone]

Filing Company Information

Continental Casualty Company
151 N. Franklin Street
Chicago, IL 60606
(312) 822-4006 ext. [Phone]

CoCode: 20443
Group Code: 218
Group Name: CNA Insurance
Companies
FEIN Number: 36-2114545

State of Domicile: Illinois
Company Type: Property and
Casualty
State ID Number:

SERFF Tracking #: CNAB-133114869 **State Tracking #:** CNAB-133114869

Company Tracking #: PA-OP-GEN2-RA20-R1 (RATE ONLY)

State:	Pennsylvania	Filing Company:	Continental Casualty Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.003 Other		
Product Name:	PA-OP-GEN2-RA20-R1		
Project Name/Number:	PA-OP-GEN2-RA20-R1 (RATE ONLY)/		

Filing Fees

State Fees

Fee Required? No

Retaliatory? No

Fee Explanation:

State:	Pennsylvania	Filing Company:	Continental Casualty Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.003 Other		
Product Name:	PA-OP-GEN2-RA20-R1		
Project Name/Number:	PA-OP-GEN2-RA20-R1 (RATE ONLY)/		

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved	Michael Hibbert	08/09/2022	08/09/2022

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Disapproved	Michael Hibbert	07/12/2022	07/12/2022
Disapproved	Michael Hibbert	03/09/2022	03/09/2022

Response Letters

Responded By	Created On	Date Submitted
Louis Scarim	08/08/2022	08/08/2022
Peter Shugart	05/06/2022	05/06/2022

Amendments

Schedule	Schedule Item Name	Created By	Created On	Date Submitted
Supporting Document	Response to 2/26/2022 Note To Filer	Peter Shugart	03/03/2022	03/08/2022

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
We need Excel	Note To Filer	Jim Laverty	02/26/2022	02/26/2022

SERFF Tracking #:	CNAB-133114869	State Tracking #:	CNAB-133114869	Company Tracking #:	PA-OP-GEN2-RA20-R1 (RATE ONLY)
State:	Pennsylvania	Filing Company:	Continental Casualty Company		
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.003 Other				
Product Name:	PA-OP-GEN2-RA20-R1				
Project Name/Number:	PA-OP-GEN2-RA20-R1 (RATE ONLY)/				

Disposition

Disposition Date: 08/09/2022

Effective Date:

Status: Approved

Comment: Aug 9, 2022

Louis Scarim
Continental Casualty Company
151 N. Franklin Street
Chicago, IL 60606

RE: Proposed 45.7% rate increase on 2,569 policyholders of forms P1-21295-A37/-A87, P1-21300-A37/-A87, P1-21305-A37/-A87, P1-N0022-A37/-A87/-B37/-B87, P1-N0023-A37/-A87/-B37, P1-N0026-A37/-A87/-B37/-B87, P1-N0027-A37/-A87/-B37, P1-N0030-A37/-A87, P1-N0031-A37/-A87, & P1-N0034-A37/-A87.
Pennsylvania Insurance Department ID #: CNAB-133114869

Dear Louis Scarim:

The Department approves the rates proposed on 8/8/2022 for the Preferred Advantage and TQ blocks of policies.

Sincerely,

Michael Hibbert
Actuarial Associate
Bureau of Accident & Health Insurance

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
Continental Casualty Company	49.700%	49.700%	\$3,741,829	2,569	\$7,529,267	67.300%	36.400%

Schedule Rate (revised)	Schedule Item	Schedule Item Status	Public Access
	PA Rate Supplement & Rate Sheets		Yes

State:	Pennsylvania	Filing Company:	Continental Casualty Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.003 Other		
Product Name:	PA-OP-GEN2-RA20-R1		
Project Name/Number:	PA-OP-GEN2-RA20-R1 (RATE ONLY)/		

Schedule	Schedule Item	Schedule Item Status	Public Access
Rate (revised)	TQ Rate Supplement & Rate Sheets		Yes
Rate	PA Rate Supplement & Rate Sheets		No
Rate	TQ Rate Supplement & Rate Sheets		No
Supporting Document	Transmittal Letter (A&H)		Yes
Supporting Document	Actuarial Certification (A&H)		Yes
Supporting Document	Actuarial Memorandum and Explanatory Information (A&H)		Yes
Supporting Document	Advertisements (A&H)		Yes
Supporting Document	Authorization to File (A&H)		Yes
Supporting Document	Insert Page Explanation (A&H)		Yes
Supporting Document	Rate Table (A&H)		Yes
Supporting Document	Replacement Form with Highlighted Changes (A&H)		Yes
Supporting Document	Advertisement Compliance Certification		Yes
Supporting Document	Reserve Calculation (A&H)		Yes
Supporting Document	Variability Explanation (A&H)		Yes
Supporting Document	Response to 2/26/2022 Note To Filer		Yes
Supporting Document	Response to 3/9/2022 Objection Letter		Yes
Supporting Document	Response to 7/12/2022 Objection Letter - Acceptance Letter		Yes

State: Pennsylvania **Filing Company:** Continental Casualty Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other
Product Name: PA-OP-GEN2-RA20-R1
Project Name/Number: PA-OP-GEN2-RA20-R1 (RATE ONLY)/

Objection Letter

Objection Letter Status Disapproved
Objection Letter Date 07/12/2022
Submitted Date 07/12/2022
Respond By Date

Dear Louis Scarim,

Introduction:

Jul 12, 2022

Louis Scarim
Continental Casualty Company
151 N. Franklin Street
Chicago, IL 60606

RE: Proposed 45.7% rate increase on 2,569 policyholders of forms P1-21295-A37/-A87, P1-21300-A37/-A87, P1-21305-A37/-A87, P1-N0022-A37/-A87/-B37/-B87, P1-N0023-A37/-A87/-B37, P1-N0026-A37/-A87/-B37/-B87, P1-N0027-A37/-A87/-B37, P1-N0030-A37/-A87, P1-N0031-A37/-A87, & P1-N0034-A37/-A87.

Pennsylvania Insurance Department ID #: CNAB-133114869

Dear Louis Scarim:

The captioned filing has been reviewed by the Pennsylvania Insurance Department. It has been determined that the filing fails to meet the requirements of our Insurance Company Laws or regulations and is therefore disapproved pursuant to the authority granted under Section 304(a) of Act 134, the Accident and Health Filing Reform Act. In the event you have any questions regarding the stated concerns, please feel free to contact the Department for further clarification.

The disapproved filing may be resubmitted within 120 days of the date of disapproval. If the Department does not hear from you within 120 days, the subject filing will be permanently closed. Such filings resubmitted after 120 days must be submitted as a new filing, inclusive of appropriate filing fees and disclosure of the closed filing SERFF tracking number.

The Department cannot approve your requested increase because our current guidelines do not allow us to approve increases of greater than 30% in any calendar year. Please propose an increase staged over two years such that the cumulative value of the two increases is equal to the original requested increases for each policy and no increase in either year is greater than 30%.

Lastly, please provide a seriatim listing of the 2,569 Continental Casualty policies in this block in Excel. Each row within the worksheet must contain the policy's unique identification number, form number, series (i.e. TQ or Preferred Advantage), issue age, issue date, inflation status indicator, benefit period, and Continental Casualty's suggested premium increase in each year of the proposed implementation period.

If Continental Casualty would like to accept our offer, then please respond with an acceptance letter and the seriatim listing.

Sincerely,

Michael Hibbert
Actuarial Associate
Bureau of Accident & Health Insurance

Conclusion:

SERFF Tracking #: CNAB-133114869 **State Tracking #:** CNAB-133114869

Company Tracking #: PA-OP-GEN2-RA20-R1 (RATE ONLY)

State:	Pennsylvania	Filing Company:	Continental Casualty Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.003 Other		
Product Name:	PA-OP-GEN2-RA20-R1		
Project Name/Number:	PA-OP-GEN2-RA20-R1 (RATE ONLY)/		

Sincerely,
Michael Hibbert

State: Pennsylvania **Filing Company:** Continental Casualty Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other
Product Name: PA-OP-GEN2-RA20-R1
Project Name/Number: PA-OP-GEN2-RA20-R1 (RATE ONLY)/

Objection Letter

Objection Letter Status Disapproved
Objection Letter Date 03/09/2022
Submitted Date 03/09/2022
Respond By Date

Dear Louis Scarim,

Introduction:

Mar 9, 2022

Louis Scarim
Continental Casualty Company
151 N. Franklin Street
Chicago, IL 60606

RE: Proposed 45.7% rate increase on 2,569 policyholders of forms P1-21295-A37/-A87, P1-21300-A37/-A87, P1-21305-A37/-A87, P1-N0022-A37/-A87/-B37/-B87, P1-N0023-A37/-A87/-B37, P1-N0026-A37/-A87/-B37/-B87, P1-N0027-A37/-A87/-B37, P1-N0030-A37/-A87, P1-N0031-A37/-A87, & P1-N0034-A37/-A87.

Pennsylvania Insurance Department ID #: CNAB-133114869

Dear Louis Scarim:

The captioned filing has been reviewed by the Pennsylvania Insurance Department. It has been determined that the filing fails to meet the requirements of our Insurance Company Laws or regulations and is therefore disapproved pursuant to the authority granted under Section 304(a) of Act 134, the Accident and Health Filing Reform Act. In the event you have any questions regarding the stated concerns, please feel free to contact the Department for further clarification.

The disapproved filing may be resubmitted within 120 days of the date of disapproval. If the Department does not hear from you within 120 days, the subject filing will be permanently closed. Such filings resubmitted after 120 days must be submitted as a new filing, inclusive of appropriate filing fees and disclosure of the closed filing SERFF tracking number.

Please furnish the following information to the Department.

1. Please provide a table in an Excel spreadsheet (perhaps similar to Exhibit 3a – Lifetime Benefits & Standard Inflation) for this nationwide block of Preferred Advantage policies which shows the historical and projected nationwide earned premium and incurred claims on a calendar year basis assuming no rate increase is granted. Please restate the nationwide historical and projected earned premium so that the business from inception appears to have all been earned at the original rate level. The original rate level is the rate level that would have existed if no increase was ever granted on any policy nationwide. Answer this question considering only the policies represented in Exhibit 3a (i.e. Preferred Advantage Lifetime Benefits & Standard Inflation).
2. Please provide the percent of active Preferred Advantage policyholders remaining on a nationwide basis. How many Preferred Advantage policies were issued nationwide? How many policies remain in force nationwide? Answer this question considering only the policies represented in Exhibit 3a (i.e. Preferred Advantage Lifetime Benefits & Standard Inflation).
3. Please provide the cumulative weighted average increase granted on policies in force on this block in PA. Answer this question considering only the policies represented in Exhibit 3a (i.e. Preferred Advantage Lifetime Benefits & Standard Inflation).
4. Please provide a table in an Excel spreadsheet (perhaps similar to Exhibit 3b – without Lifetime Benefits & with Standard Inflation) for this nationwide block of Preferred Advantage policies which shows the historical and projected nationwide earned premium and

State: Pennsylvania **Filing Company:** Continental Casualty Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other
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incurred claims on a calendar year basis assuming no rate increase is granted. Please restate the nationwide historical and projected earned premium so that the business from inception appears to have all been earned at the original rate level. The original rate level is the rate level that would have existed if no increase was ever granted on any policy nationwide. Answer this question considering only the policies represented in Exhibit 3b (i.e. Preferred Advantage without Lifetime Benefits & with Standard Inflation).

5. Please provide the percent of active Preferred Advantage policyholders remaining on a nationwide basis. How many Preferred Advantage policies were issued nationwide? How many policies remain in force nationwide? Answer this question considering only the policies represented in Exhibit 3b (i.e. Preferred Advantage without Lifetime Benefits & with Standard Inflation).

6. Please provide the cumulative weighted average increase granted on policies in force on this block in PA. Answer this question considering only the policies represented in Exhibit 3b (i.e. Preferred Advantage without Lifetime Benefits & with Standard Inflation).

7. Please provide a table in an Excel spreadsheet (perhaps similar to Exhibit 3c – with Lifetime Benefits & without Standard Inflation) for this nationwide block of Preferred Advantage policies which shows the historical and projected nationwide earned premium and incurred claims on a calendar year basis assuming no rate increase is granted. Please restate the nationwide historical and projected earned premium so that the business from inception appears to have all been earned at the original rate level. The original rate level is the rate level that would have existed if no increase was ever granted on any policy nationwide. Answer this question considering only the policies represented in Exhibit 3c (i.e. Preferred Advantage with Lifetime Benefits & without Standard Inflation).

8. Please provide the percent of active Preferred Advantage policyholders remaining on a nationwide basis. How many Preferred Advantage policies were issued nationwide? How many policies remain in force nationwide? Answer this question considering only the policies represented in Exhibit 3c (i.e. with Preferred Advantage Lifetime Benefits & without Standard Inflation).

9. Please provide the cumulative weighted average increase granted on policies in force on this block in PA. Answer this question considering only the policies represented in Exhibit 3c (i.e. Preferred Advantage with Lifetime Benefits & without Standard Inflation).

10. Please provide a table in an Excel spreadsheet (perhaps similar to Exhibit 3d – with Lifetime Benefits & Standard Inflation) for this nationwide block of TQ policies which shows the historical and projected nationwide earned premium and incurred claims on a calendar year basis assuming no rate increase is granted. Please restate the nationwide historical and projected earned premium so that the business from inception appears to have all been earned at the original rate level. The original rate level is the rate level that would have existed if no increase was ever granted on any policy nationwide. Answer this question considering only the policies represented in Exhibit 3d (i.e. TQ with Lifetime Benefits & Standard Inflation).

11. Please provide the percent of active TQ policyholders remaining on a nationwide basis. How many TQ policies were issued nationwide? How many policies remain in force nationwide? Answer this question considering only the policies represented in Exhibit 3d (i.e. TQ with Lifetime Benefits & Standard Inflation).

12. Please provide the cumulative weighted average increase granted on policies in force on this block in PA. Answer this question considering only the policies represented in Exhibit 3d (i.e. TQ with Lifetime Benefits & Standard Inflation).

13. Please provide a table in an Excel spreadsheet (perhaps similar to Exhibit 3e – without Lifetime Benefits & with Standard Inflation) for this nationwide block of TQ policies which shows the historical and projected nationwide earned premium and incurred claims on a calendar year basis assuming no rate increase is granted. Please restate the nationwide historical and projected earned premium so that the business from inception appears to have all been earned at the original rate level. The original rate level is the rate level that would have existed if no increase was ever granted on any policy nationwide. Answer this question considering only the policies represented in Exhibit 3e (i.e. TQ without Lifetime Benefits & with Standard Inflation).

14. Please provide the percent of active TQ policyholders remaining on a nationwide basis. How many TQ policies were issued nationwide? How many policies remain in force nationwide? Answer this question considering only the policies represented in Exhibit

State: Pennsylvania **Filing Company:** Continental Casualty Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other
Product Name: PA-OP-GEN2-RA20-R1
Project Name/Number: PA-OP-GEN2-RA20-R1 (RATE ONLY)

3e (i.e. TQ without Lifetime Benefits & with Standard Inflation).

15. Please provide the cumulative weighted average increase granted on policies in force on this block in PA. Answer this question considering only the policies represented in Exhibit 3e (i.e. TQ without Lifetime Benefits & with Standard Inflation).

16. Please provide a table in an Excel spreadsheet (perhaps similar to Exhibit 3f – with Lifetime Benefits & without Standard Inflation) for this nationwide block of TQ policies which shows the historical and projected nationwide earned premium and incurred claims on a calendar year basis assuming no rate increase is granted. Please restate the nationwide historical and projected earned premium so that the business from inception appears to have all been earned at the original rate level. The original rate level is the rate level that would have existed if no increase was ever granted on any policy nationwide. Answer this question considering only the policies represented in Exhibit 3f (i.e. TQ with Lifetime Benefits & without Standard Inflation).

17. Please provide the percent of active TQ policyholders remaining on a nationwide basis. How many TQ policies were issued nationwide? How many policies remain in force nationwide? Answer this question considering only the policies represented in Exhibit 3f (i.e. TQ with Lifetime Benefits & without Standard Inflation).

18. Please provide the cumulative weighted average increase granted on policies in force on this block in PA. Answer this question considering only the policies represented in Exhibit 3f (i.e. TQ with Lifetime Benefits & without Standard Inflation).

19. Please provide a listing of the past requested increases and approved increases by state for this block. Also include a column showing the cumulative increases approved in each state to date.

20. Please provide the letter that will be sent to policyholders to inform them of the increase and their available options.

21. How many Preferred Advantage policies with standard inflation and lifetime benefits are in force in this block? How many were issued on or after 9-15-2002?

22. How many Preferred Advantage policies with standard inflation but without lifetime benefits are in force in this block? How many were issued on or after 9-15-2002?

23. How many Preferred Advantage policies without standard inflation but with lifetime benefits are in force in this block? How many were issued on or after 9-15-2002?

24. How many Preferred Advantage policies without standard inflation and without lifetime benefits are in force in this block? How many were issued on or after 9-15-2002?

25. How many TQ policies with standard inflation and lifetime benefits are in force in this block? How many were issued on or after 9-15-2002?

26. How many TQ policies with standard inflation but without lifetime benefits are in force in this block? How many were issued on or after 9-15-2002?

27. How many TQ policies without standard inflation but with lifetime benefits are in force in this block? How many were issued on or after 9-15-2002?

28. How many TQ policies without standard inflation and without lifetime benefits are in force in this block? How many were issued on or after 9-15-2002?

29. The actuarial memo states that these policies were sold nationally from 1994 through 2004. When were they sold in PA?

State: Pennsylvania **Filing Company:** Continental Casualty Company
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30. Please define what "standard inflation means". Were any policies issued with non-standard inflation options in this block?

31. Continental Casualty has offered the surrender option in the past. The company also offered a conversion option that provided a paid-up benefit of 100% of premium paid plus a cash payment. What is the approximate percent of policyholders that, when offered a cash surrender option, actually choose to exercise it?

Sincerely,

Michael Hibbert
Actuarial Associate
Bureau of Accident & Health Insurance

Conclusion:

Sincerely,
Michael Hibbert

State:	Pennsylvania	Filing Company:	Continental Casualty Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.003 Other		
Product Name:	PA-OP-GEN2-RA20-R1		
Project Name/Number:	PA-OP-GEN2-RA20-R1 (RATE ONLY)/		

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	08/08/2022
Submitted Date	08/08/2022

Dear Michael Hibbert,

Introduction:

Response 1

Comments:

Please see the attached acceptance letter and supporting documents along with revised rate supplements and a post-submission update with updated rate information on the Rate/Rule tab.

Changed Items:

No Form Schedule items changed.

State: Pennsylvania Filing Company: Continental Casualty Company
 TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other
 Product Name: PA-OP-GEN2-RA20-R1
 Project Name/Number: PA-OP-GEN2-RA20-R1 (RATE ONLY)/

Rate/Rule Schedule Item Changes						
Item No.	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments	Date Submitted
1	PA Rate Supplement & Rate Sheets	P1-21295-A37/-A87, P1-21300-A37/-A87, P1-21305-A37/-A87	Revised	Previous State Filing Number: CNAB-132346264 Percent Rate Change Request: 51.5	2021 PA Supplement to Rate Sheets - PA_v2.pdf,	08/08/2022 By: Louis Scarim
Previous Version						
1	PA Rate Supplement & Rate Sheets	P1-21295-A37/-A87, P1-21300-A37/-A87, P1-21305-A37/-A87	Revised	Previous State Filing Number: CNAB-132346264 Percent Rate Change Request: 46.9	PA Rate Supplement and Rate Sheets - PA.pdf,	02/23/2022 By: Peter Shugart
2	TQ Rate Supplement & Rate Sheets	P1-N0022-A37/-A87/-B37/-B87, P1-N0023-A37/-A87/-B37, P1-N0026-A37/-A87/-B37/-B87, P1-N0027-A37/-A87/-B37, P1-N0030-A37/-A87, P1-N0031-A37/-A87, P1-N0034-A37/-A87	Revised	Previous State Filing Number: CNAB-132346264 Percent Rate Change Request: 48.8	2021 TQ Supplement to Rate Sheets - PA_v2.pdf,	08/08/2022 By: Louis Scarim
Previous Version						
2	TQ Rate Supplement & Rate Sheets	P1-N0022-A37/-A87/-B37/-B87, P1-N0023-A37/-A87/-B37, P1-N0026-A37/-A87/-B37/-B87, P1-N0027-A37/-A87/-B37, P1-N0030-A37/-A87, P1-N0031-A37/-A87, P1-N0034-A37/-A87	Revised	Previous State Filing Number: CNAB-132346264 Percent Rate Change Request: 45	TQ Rate Supplement and Rate Sheets - PA.pdf,	02/23/2022 By: Peter Shugart

State:	Pennsylvania	Filing Company:	Continental Casualty Company
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Supporting Document Schedule Item Changes	
Satisfied - Item:	Response to 7/12/2022 Objection Letter - Acceptance Letter
Comments:	
Attachment(s):	Acceptance Letter - PA GEN2.pdf PA Seriatim Insured - GEN2 Final.xlsx PA Cost of Waiting Analysis - Both GEN1 & GEN2.pdf PA - Infl LT - NW Equivalent LLR - 2 Year Increase.pdf PA - Infl NLT - NW Equivalent LLR - 2 Year Increase.pdf PA - NInfl LT - NW Equivalent LLR - 2 Year Increase.pdf TQ - Infl LT - NW Equivalent LLR - 2 Year Increase.pdf TQ - Infl NLT - NW Equivalent LLR - 2 Year Increase.pdf TQ - NInfl LT - NW Equivalent LLR - 2 Year Increase.pdf

Conclusion:

Please let me know if you have any questions or need anything else. Thank you for your time and consideration.

Sincerely,

Louis Scarim

State:	Pennsylvania	Filing Company:	Continental Casualty Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.003 Other		
Product Name:	PA-OP-GEN2-RA20-R1		
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Response Letter

Response Letter Status	Submitted to State
Response Letter Date	05/06/2022
Submitted Date	05/06/2022

Dear Michael Hibbert,

Introduction:

Response 1

Comments:

Please see the attached response letter and supporting documents provided on the Supporting Documentation tab.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes

Satisfied - Item:	Response to 3/9/2022 Objection Letter
Comments:	
Attachment(s):	Response to Objection Letter (03.09.2022) - PA OP Gen2.pdf Item 1 – Exhibit 3a_Original Rate Level.xlsx Item 4 – Exhibit 3b_Original Rate Level.xlsx Item 7 – Exhibit 3c_Original Rate Level.xlsx Item 10 – Exhibit 3d_Original Rate Level.xlsx Item 13 – Exhibit 3e_Original Rate Level.xlsx Item 16 – Exhibit 3f_Original Rate Level.xlsx Item 19 - State Status Listing - OP Gen2 (as of 05.03.2022).xlsx Item 20 – Notification_ILTC_NoRI_NW_2021 11042021.pdf Item 20 – Notification_ILTC_RI_NW_2021 11042021.pdf

Conclusion:

Sincerely,
Peter Shugart

State:	Pennsylvania	Filing Company:	Continental Casualty Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.003 Other		
Product Name:	PA-OP-GEN2-RA20-R1		
Project Name/Number:	PA-OP-GEN2-RA20-R1 (RATE ONLY)/		

Amendment Letter

Submitted Date: 03/08/2022

Comments:

Mr. Lavery,

Please see the Excel versions of the exhibits included under the Supporting Documentation tab. Please let us know if we can provide anything else to assist in your review.

Thanks,
Peter Shugart

Changed Items:

No Form Schedule Items Changed.

No Rate Schedule Items Changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Response to 2/26/2022 Note To Filer
Comments:	
Attachment(s):	Exhibits 1a-4a (PA PA Infl LT).xlsx Exhibits 1b-4b (PA PA Infl NLT).xlsx Exhibits 1c-4c (PA PA NInfl LT).xlsx Exhibits 1d-4d (PA TQ Infl LT).xlsx Exhibits 1e-4e (PA TQ Infl NLT).xlsx Exhibits 1f-4f (PA TQ Infl NLT).xlsx

State: Pennsylvania **Filing Company:** Continental Casualty Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other
Product Name: PA-OP-GEN2-RA20-R1
Project Name/Number: PA-OP-GEN2-RA20-R1 (RATE ONLY)/

Note To Filer

Created By:

Jim Laverty on 02/26/2022 08:39 AM

Last Edited By:

Michael Hibbert

Submitted On:

08/09/2022 11:34 AM

Subject:

We need Excel

Comments:

Please provide the attachments, tables, and exhibits in this filing in an Excel workbook.
Thanks.

State: Pennsylvania **Filing Company:** Continental Casualty Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.003 Other
Product Name: PA-OP-GEN2-RA20-R1
Project Name/Number: PA-OP-GEN2-RA20-R1 (RATE ONLY)/

Post Submission Update Request Processed On 08/09/2022

Status: Allowed
Created By: Peter Shugart
Processed By: Michael Hibbert
Comments:

General Information:

Field Name	Requested Change	Prior Value
Overall Rate Impact	49.7	45.7

Company Rate Information:

Company Name:Continental Casualty Company

Field Name	Requested Change	Prior Value
Overall % Indicated Change	49.700%	45.700%
Overall % Rate Impact	49.700%	45.700%
Written Premium Change for this Program	\$3741829	\$3440288
Maximum %Change (where required)	67.300%	60.000%
Minimum %Change (where required)	36.400%	35.000%

SERFF Tracking #:	CNAB-133114869	State Tracking #:	CNAB-133114869	Company Tracking #:	PA-OP-GEN2-RA20-R1 (RATE ONLY)
State:	Pennsylvania	Filing Company:	Continental Casualty Company		
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.003 Other				
Product Name:	PA-OP-GEN2-RA20-R1				
Project Name/Number:	PA-OP-GEN2-RA20-R1 (RATE ONLY)/				

Rate Information

Rate data applies to filing.

Filing Method:	SERFF
Rate Change Type:	Increase
Overall Percentage of Last Rate Revision:	7.305%
Effective Date of Last Rate Revision:	02/01/2021
Filing Method of Last Filing:	SERFF
SERFF Tracking Number of Last Filing:	CNAB-132346264

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
Continental Casualty Company	49.700%	49.700%	\$3,741,829	2,569	\$7,529,267	67.300%	36.400%

State:	Pennsylvania	Filing Company:	Continental Casualty Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.003 Other		
Product Name:	PA-OP-GEN2-RA20-R1		
Project Name/Number:	PA-OP-GEN2-RA20-R1 (RATE ONLY)/		

Rate/Rule Schedule

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments
1		PA Rate Supplement & Rate Sheets	P1-21295-A37/-A87, P1-21300-A37/-A87, P1-21305-A37/-A87	Revised	Previous State Filing Number: CNAB-132346264 Percent Rate Change Request: 51.5	2021 PA Supplement to Rate Sheets - PA_v2.pdf,
2		TQ Rate Supplement & Rate Sheets	P1-N0022-A37/-A87/-B37/-B87, P1-N0023-A37/-A87/-B37, P1-N0026-A37/-A87/-B37/-B87, P1-N0027-A37/-A87/-B37, P1-N0030-A37/-A87, P1-N0031-A37/-A87, P1-N0034-A37/-A87	Revised	Previous State Filing Number: CNAB-132346264 Percent Rate Change Request: 48.8	2021 TQ Supplement to Rate Sheets - PA_v2.pdf,

THIS POLICY IS FOR RENEWAL BUSINESS ONLY

**CONTINENTAL CASUALTY COMPANY
PENNSYLVANIA
Preferred Advantage Product Portfolio
Supplement to Rate Sheets for Policy Forms:**

P1-21295-A37/-A87	P1-21300-A37/-A87	P1-21305-A37/-A87
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Rates in the above forms should be multiplied by the following factors:

Cumulative Rate Increase			
Automatic Increase Benefit Rider	Benefit Period	Year 1 Factor	Year 2+ Factor
Inflation	Lifetime	3.804295	4.896128
Inflation	Non-Lifetime	3.804295	4.013532
Inflation	Lifetime	3.804295	3.990706
Inflation	Non-Lifetime	2.926381	2.926381

These amounts reflect the following prior approved and current rate increases:

Prior Approved Rate Increases				
Automatic Increase Benefit Rider	Benefit Period	Approval Date	Effective Date	Amount Approved
All	All	7/10/2003	1/1/2004	50.00%
All	All	9/2/2011	2/1/2012	11.80%
All	All	9/2/2011	2/1/2013	11.80%
All	All	3/23/2016	9/1/2016	20.00%
All	All	4/3/2018	10/1/2018	9.54%
All	All	4/3/2018	10/1/2019	9.54%
All	All	8/22/2020	2/1/2021	8.40%

Current Rate Increase			
Automatic Increase Benefit Rider	Benefit Period	Year 1 Amount	Year 2 Amount
Inflation	Lifetime	30.0%	28.7%
Inflation	Non-Lifetime	30.0%	5.5%
Non-Inflation	Lifetime	30.0%	4.9%
Non-Inflation	Non-Lifetime	0.0%	0.0%

THIS POLICY IS FOR RENEWAL BUSINESS ONLY

CONTINENTAL CASUALTY COMPANY
PENNSYLVANIA
TQ Product Portfolio

Supplement to Rate Sheets for Policy Forms:

P1-N0022-A37/-A87/-B37/-B87	P1-N0023-A37/-A87/-B37	P1-N0026-A37/-A87/-B37/-B87	P1-N0027-A37/-A87/-B37	P1-N0030-A37/-A87
P1-N0031-A37/-A87	P1-N0034-A37/-A87			

Rates in the above forms should be multiplied by the following factors:

Cumulative Rate Increase			
Automatic Increase Benefit Rider	Benefit Period	Year 1 Factor	Year 2+ Factor
Inflation	Lifetime	3.423866	4.389396
Inflation	Non-Lifetime	3.423866	3.601907
Non-Inflation	Lifetime	3.423866	3.595059
Non-Inflation	Non-Lifetime	2.633743	2.633743

These amounts reflect the following prior approved and current rate increases:

Prior Approved Rate Increases				
Automatic Increase Benefit Rider	Benefit Period	Approval Date	Effective Date	Amount Approved
All	All	11/18/2004	6/1/2005	35.00%
All	All	9/2/2011	2/1/2012	11.80%
All	All	9/2/2011	2/1/2013	11.80%
All	All	3/23/2016	9/1/2016	20.00%
All	All	4/3/2018	10/1/2018	9.54%
All	All	4/3/2018	10/1/2019	9.54%
All	All	8/22/2020	2/1/2021	8.40%

Current Rate Increase			
Automatic Increase Benefit Rider	Benefit Period	Year 1 Amount	Year 2 Amount
Inflation	Lifetime	30.0%	28.2%
Inflation	Non-Lifetime	30.0%	5.2%
Non-Inflation	Lifetime	30.0%	5.0%
Non-Inflation	Non-Lifetime	0.0%	0.0%

State:	Pennsylvania	Filing Company:	Continental Casualty Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.003 Other		
Product Name:	PA-OP-GEN2-RA20-R1		
Project Name/Number:	PA-OP-GEN2-RA20-R1 (RATE ONLY)/		

Supporting Document Schedules

Bypassed - Item:	Transmittal Letter (A&H)
Bypass Reason:	Not required for this rate increase filing.
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Actuarial Certification (A&H)
Comments:	The required Certification can be found in the Actuarial Memorandum.
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Actuarial Memorandum and Explanatory Information (A&H)
Comments:	
Attachment(s):	Exhibits 1d-4d (PA TQ Infl LT).pdf Exhibits 1e-4e (PA TQ Infl NLT).pdf Exhibits 1f-4f (PA TQ NInfl LT).pdf Exhibits 1a-4a (PA PA Infl LT).pdf Exhibits 1b-4b (PA PA Infl NLT).pdf Exhibits 1c-4c (PA PA NInfl LT).pdf 20201231 - Cover Letter - OP Gen2 (PA TQ) - PA.pdf 20201231 - Actuarial Memorandum - OP Gen2 (PA TQ) - PA.pdf
Item Status:	
Status Date:	

Bypassed - Item:	Advertisements (A&H)
Bypass Reason:	There are no advertisements in this filing.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Authorization to File (A&H)
Bypass Reason:	The insurer is the filer.
Attachment(s):	
Item Status:	
Status Date:	

State:	Pennsylvania	Filing Company:	Continental Casualty Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.003 Other		
Product Name:	PA-OP-GEN2-RA20-R1		
Project Name/Number:	PA-OP-GEN2-RA20-R1 (RATE ONLY)/		

Bypassed - Item:	Insert Page Explanation (A&H)
Bypass Reason:	This filing does not contain insert pages.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Rate Table (A&H)
Bypass Reason:	No new forms are being submitted.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Replacement Form with Highlighted Changes (A&H)
Bypass Reason:	This is not a form filing.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Advertisement Compliance Certification
Bypass Reason:	There are no advertisements in this filing.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Reserve Calculation (A&H)
Bypass Reason:	Not required for this rate increase filing.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Variability Explanation (A&H)
Bypass Reason:	This is not a form filing.
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Response to 2/26/2022 Note To Filer
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State:	Pennsylvania	Filing Company:	Continental Casualty Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.003 Other		
Product Name:	PA-OP-GEN2-RA20-R1		
Project Name/Number:	PA-OP-GEN2-RA20-R1 (RATE ONLY)/		

Comments:	
Attachment(s):	Exhibits 1a-4a (PA PA Infl LT).xlsx Exhibits 1b-4b (PA PA Infl NLT).xlsx Exhibits 1c-4c (PA PA NInfl LT).xlsx Exhibits 1d-4d (PA TQ Infl LT).xlsx Exhibits 1e-4e (PA TQ Infl NLT).xlsx Exhibits 1f-4f (PA TQ Infl NLT).xlsx
Item Status:	
Status Date:	
Satisfied - Item:	Response to 3/9/2022 Objection Letter
Comments:	
Attachment(s):	Response to Objection Letter (03.09.2022) - PA OP Gen2.pdf Item 1 – Exhibit 3a_Original Rate Level.xlsx Item 4 – Exhibit 3b_Original Rate Level.xlsx Item 7 – Exhibit 3c_Original Rate Level.xlsx Item 10 – Exhibit 3d_Original Rate Level.xlsx Item 13 – Exhibit 3e_Original Rate Level.xlsx Item 16 – Exhibit 3f_Original Rate Level.xlsx Item 19 - State Status Listing - OP Gen2 (as of 05.03.2022).xlsx Item 20 – Notification_ILTC_NoRI_NW_2021 11042021.pdf Item 20 – Notification_ILTC_RI_NW_2021 11042021.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Response to 7/12/2022 Objection Letter - Acceptance Letter
Comments:	
Attachment(s):	Acceptance Letter - PA GEN2.pdf PA Seriatim Insured - GEN2 Final.xlsx PA Cost of Waiting Analysis - Both GEN1 & GEN2.pdf PA - Infl LT - NW Equivalent LLR - 2 Year Increase.pdf PA - Infl NLT - NW Equivalent LLR - 2 Year Increase.pdf PA - NInfl LT - NW Equivalent LLR - 2 Year Increase.pdf TQ - Infl LT - NW Equivalent LLR - 2 Year Increase.pdf TQ - Infl NLT - NW Equivalent LLR - 2 Year Increase.pdf TQ - NInfl LT - NW Equivalent LLR - 2 Year Increase.pdf
Item Status:	
Status Date:	

State:	Pennsylvania	Filing Company:	Continental Casualty Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.003 Other		
Product Name:	PA-OP-GEN2-RA20-R1		
Project Name/Number:	PA-OP-GEN2-RA20-R1 (RATE ONLY)/		

Attachment Exhibits 1a-4a (PA PA Infl LT).xlsx is not a PDF document and cannot be reproduced here.

Attachment Exhibits 1b-4b (PA PA Infl NLT).xlsx is not a PDF document and cannot be reproduced here.

Attachment Exhibits 1c-4c (PA PA NInfl LT).xlsx is not a PDF document and cannot be reproduced here.

Attachment Exhibits 1d-4d (PA TQ Infl LT).xlsx is not a PDF document and cannot be reproduced here.

Attachment Exhibits 1e-4e (PA TQ Infl NLT).xlsx is not a PDF document and cannot be reproduced here.

Attachment Exhibits 1f-4f (PA TQ Infl NLT).xlsx is not a PDF document and cannot be reproduced here.

Attachment Item 1 Exhibit 3a_Original Rate Level.xlsx is not a PDF document and cannot be reproduced here.

Attachment Item 4 Exhibit 3b_Original Rate Level.xlsx is not a PDF document and cannot be reproduced here.

Attachment Item 7 Exhibit 3c_Original Rate Level.xlsx is not a PDF document and cannot be reproduced here.

Attachment Item 10 Exhibit 3d_Original Rate Level.xlsx is not a PDF document and cannot be reproduced here.

Attachment Item 13 Exhibit 3e_Original Rate Level.xlsx is not a PDF document and cannot be reproduced here.

Attachment Item 16 Exhibit 3f_Original Rate Level.xlsx is not a PDF document and cannot be reproduced here.

SERFF Tracking #:	CNAB-133114869	State Tracking #:	CNAB-133114869	Company Tracking #:	PA-OP-GEN2-RA20-R1 (RATE ONLY)
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State:	Pennsylvania	Filing Company:	Continental Casualty Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.003 Other		
Product Name:	PA-OP-GEN2-RA20-R1		
Project Name/Number:	PA-OP-GEN2-RA20-R1 (RATE ONLY)/		

Attachment Item 19 - State Status Listing - OP Gen2 (as of 05.03.2022).xlsx is not a PDF document and cannot be reproduced here.

Attachment PA Seriatim Insured - GEN2 Final.xlsx is not a PDF document and cannot be reproduced here.

Exhibit 1d
Continental Casualty Company
TQ - Policy Forms with Lifetime Benefits & Standard Inflation
State Specific Information
Pennsylvania

12) Average Annualized Premium as of 12/31/2020

	Nationwide	Pennsylvania
Without Increase	\$3,156	\$3,533
With Increase	\$5,050	\$5,652

13) Insured Count and Premium as of 12/31/2020

Insureds Eligible for Rate Increase

	Nationwide	Pennsylvania
Insureds Not on Claim	5,989	523
Insureds on Claim	623	39
Total Insureds	6,612	562
2020 Annualized Premium	\$20,867,515	\$1,985,359

Insureds Not Eligible for Rate Increase

	Nationwide	Pennsylvania
Non-Forfeiture Insureds Not on Claim	539	58
Non-Forfeiture Insureds on Claim	12	0
Paid-Up Limited Pay Insureds Not on Claim	7	0
Paid-Up Limited Pay Insureds on Claim	0	0
Total Non-Forfeiture and Paid-Up Insureds	558	58

18) History of Rate Adjustments

SERFF Number	Approval Date	Rate Increase Approved
N/A	11/18/2004	35.0%
CNAB-127154621	9/2/2011	25.0%*
CNAB-130150831	3/23/2016	20.0%
CNAB-131276497	4/3/2018	20.0%**
CNAB-132346264	8/22/2020	8.4%

*Implemented over a two-year period (11.8%, 11.8%)**

*Implemented over a two-year period (9.54%, 9.54%)***

20) Satisfaction of Minimum Loss Ratio Requirements

1) Expected Lifetime Loss Ratio with Increase	131%
2) Minimum Required Loss Ratio	60%
Is 1) Greater than 2)?	Yes

Exhibit 2d
Continental Casualty Company
TQ - Policy Forms with Lifetime Benefits & Standard Inflation
Distribution of Inforce Insureds Eligible for Rate Increase
Pennsylvania

		Nationwide				Pennsylvania			
		Count	% of Count	Premium	% of Premium	Count	% of Count	Premium	% of Premium
Issue Year	1987	0	0%	\$0	0%	0	0%	\$0	0%
	1988	0	0%	\$0	0%	0	0%	\$0	0%
	1989	0	0%	\$0	0%	0	0%	\$0	0%
	1990	0	0%	\$0	0%	0	0%	\$0	0%
	1991	0	0%	\$0	0%	0	0%	\$0	0%
	1992	0	0%	\$0	0%	0	0%	\$0	0%
	1993	2	0%	\$4,949	0%	0	0%	\$0	0%
	1994	23	0%	\$62,729	0%	0	0%	\$0	0%
	1995	61	1%	\$158,098	1%	4	1%	\$18,112	1%
	1996	154	2%	\$443,035	2%	8	1%	\$32,050	2%
	1997	2,023	31%	\$6,134,982	29%	152	27%	\$544,343	27%
	1998	2,776	42%	\$8,825,889	42%	229	41%	\$780,018	39%
	1999	1,093	17%	\$3,596,908	17%	100	18%	\$378,642	19%
	2000	176	3%	\$580,395	3%	21	4%	\$64,429	3%
	2001	163	2%	\$584,651	3%	24	4%	\$89,569	5%
	2002	122	2%	\$420,736	2%	20	4%	\$71,323	4%
	2003	19	0%	\$55,143	0%	4	1%	\$6,872	0%
	2004	0	0%	\$0	0%	0	0%	\$0	0%
	2005	0	0%	\$0	0%	0	0%	\$0	0%
	2006	0	0%	\$0	0%	0	0%	\$0	0%
	2007	0	0%	\$0	0%	0	0%	\$0	0%
	2008	0	0%	\$0	0%	0	0%	\$0	0%
	2009	0	0%	\$0	0%	0	0%	\$0	0%
	2010	0	0%	\$0	0%	0	0%	\$0	0%
	2011	0	0%	\$0	0%	0	0%	\$0	0%
	2012	0	0%	\$0	0%	0	0%	\$0	0%
	2013	0	0%	\$0	0%	0	0%	\$0	0%
	2014	0	0%	\$0	0%	0	0%	\$0	0%
	2015	0	0%	\$0	0%	0	0%	\$0	0%
	2016	0	0%	\$0	0%	0	0%	\$0	0%
	2017	0	0%	\$0	0%	0	0%	\$0	0%
	2018	0	0%	\$0	0%	0	0%	\$0	0%
Total		6,612	100%	\$20,867,515	100%	562	100%	\$1,985,359	100%
Issue Age	<35	16	0%	\$35,431	0%	1	0%	\$2,813	0%
	35-39	60	1%	\$122,600	1%	1	0%	\$3,020	0%
	40-44	279	4%	\$577,510	3%	22	4%	\$52,829	3%
	45-49	837	13%	\$1,907,214	9%	85	15%	\$202,372	10%
	50-54	1,618	24%	\$4,247,766	20%	150	27%	\$426,641	21%
	55-59	1,908	29%	\$5,975,096	29%	158	28%	\$584,500	29%
	60-64	1,351	20%	\$5,283,491	25%	113	20%	\$532,892	27%
	65-69	477	7%	\$2,274,569	11%	29	5%	\$161,712	8%
	70-74	64	1%	\$417,523	2%	3	1%	\$18,580	1%
	75-79	2	0%	\$26,316	0%	0	0%	\$0	0%
	80+	0	0%	\$0	0%	0	0%	\$0	0%
	Total	6,612	100%	\$20,867,515	100%	562	100%	\$1,985,359	100%
Attained Age	<45	1	0%	\$3,069	0%	0	0%	\$0	0%
	45-49	1	0%	\$2,813	0%	1	0%	\$2,813	0%
	50-54	8	0%	\$16,892	0%	0	0%	\$0	0%
	55-59	35	1%	\$68,257	0%	2	0%	\$3,683	0%
	60-64	164	2%	\$347,851	2%	8	1%	\$18,680	1%
	65-69	517	8%	\$1,188,263	6%	55	10%	\$140,007	7%
	70-74	1,255	19%	\$3,103,085	15%	123	22%	\$324,293	16%
	75-79	1,977	30%	\$5,727,880	27%	169	30%	\$555,141	28%
	80-84	1,624	25%	\$5,731,884	27%	128	23%	\$546,410	28%
	85-89	838	13%	\$3,577,873	17%	68	12%	\$343,880	17%
	90+	192	3%	\$1,099,647	5%	8	1%	\$50,451	3%
	Total	6,612	100%	\$20,867,515	100%	562	100%	\$1,985,359	100%
Gender	Male	2,446	37%	\$7,939,042	38%	203	36%	\$713,706	36%
	Female	4,166	63%	\$12,928,473	62%	359	64%	\$1,271,652	64%
	Total	6,612	100%	\$20,867,515	100%	562	100%	\$1,985,359	100%
Inflation Type	None	0	0%	\$0	0%	0	0%	\$0	0%
	Simple	2,620	40%	\$7,833,108	38%	245	44%	\$789,716	40%
	Compound	3,992	60%	\$13,034,408	62%	317	56%	\$1,195,643	60%
	Total	6,612	100%	\$20,867,515	100%	562	100%	\$1,985,359	100%
Tax Status	TQ	6,612	100%	\$20,867,515	100%	562	100%	\$1,985,359	100%
	NTQ	0	0%	\$0	0%	0	0%	\$0	0%
	Total	6,612	100%	\$20,867,515	100%	562	100%	\$1,985,359	100%
Max Benefit	Lifetime	6,612	100%	\$20,867,515	100%	562	100%	\$1,985,359	100%
	Not Lifetime	0	0%	\$0	0%	0	0%	\$0	0%
	Total	6,612	100%	\$20,867,515	100%	562	100%	\$1,985,359	100%
Cov Type	Facility Only	178	3%	\$430,583	2%	15	3%	\$38,332	2%
	Comprehensive	6,434	97%	\$20,436,932	98%	547	97%	\$1,947,027	98%
	Total	6,612	100%	\$20,867,515	100%	562	100%	\$1,985,359	100%

Exhibit 3d
Continental Casualty Company
TQ - Policy Forms with Lifetime Benefits & Standard Inflation
Nationwide Historical and Projected Experience Restated with Approved Pennsylvania Rate Increases

Year	Without Rate Increase				With 60% Cumulative Rate Increase			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1988	-	-	0%	0%	-	-	0%	0%
1989	-	-	0%	0%	-	-	0%	0%
1990	-	-	0%	0%	-	-	0%	0%
1991	-	-	0%	0%	-	-	0%	0%
1992	-	-	0%	0%	-	-	0%	0%
1993	(1,808)	-	0%	0%	(1,808)	-	0%	0%
1994	4,260	-	0%	0%	4,260	-	0%	0%
1995	66,907	-	0%	0%	66,907	-	0%	0%
1996	178,960	-	0%	0%	178,960	-	0%	0%
1997	2,993,879	1,740	0%	0%	2,993,879	1,740	0%	0%
1998	14,019,879	537,489	4%	3%	14,019,879	537,489	4%	3%
1999	21,865,249	902,327	4%	4%	21,865,249	902,327	4%	4%
2000	22,623,725	4,317,492	19%	9%	22,623,725	4,317,492	19%	9%
2001	22,345,625	5,300,491	24%	13%	22,345,625	5,300,491	24%	13%
2002	22,350,109	4,324,383	19%	14%	22,350,109	4,324,383	19%	14%
2003	21,829,896	8,406,372	39%	19%	21,829,896	8,406,372	39%	19%
2004	21,185,654	7,567,765	36%	21%	21,185,654	7,567,765	36%	21%
2005	25,818,889	6,651,129	26%	22%	25,818,889	6,651,129	26%	22%
2006	26,191,738	9,895,469	38%	24%	26,191,738	9,895,469	38%	24%
2007	25,261,390	9,161,785	36%	25%	25,261,390	9,161,785	36%	25%
2008	24,587,834	11,834,705	48%	27%	24,587,834	11,834,705	48%	27%
2009	23,958,173	17,238,326	72%	31%	23,958,173	17,238,326	72%	31%
2010	23,071,327	18,087,214	78%	35%	23,071,327	18,087,214	78%	35%
2011	22,422,160	16,365,053	73%	38%	22,422,160	16,365,053	73%	38%
2012	23,819,416	24,892,408	105%	42%	23,819,416	24,892,408	105%	42%
2013	25,507,295	31,518,119	124%	48%	25,507,295	31,518,119	124%	48%
2014	24,723,238	26,067,414	105%	51%	24,723,238	26,067,414	105%	51%
2015	23,260,602	35,749,972	154%	57%	23,260,602	35,749,972	154%	57%
2016	23,527,255	40,236,783	171%	63%	23,527,255	40,236,783	171%	63%
2017	25,019,119	44,247,469	177%	69%	25,019,119	44,247,469	177%	69%
2018	23,915,938	40,762,800	170%	74%	23,915,938	40,762,800	170%	74%
2019	23,463,966	54,563,717	233%	81%	23,463,966	54,563,717	233%	81%
2020	24,741,388	53,629,008	217%	88%	24,741,388	53,629,008	217%	88%
Total Actual	538,752,064	472,259,431	88%	88%	538,752,064	472,259,431	88%	88%
Projected								
2021	25,148,370	54,382,726	216%	93%	27,732,979	53,546,319	193%	93%
2022	23,775,772	64,585,212	272%	101%	34,080,587	63,121,033	185%	98%
2023	22,220,510	62,983,020	283%	107%	32,818,804	61,046,607	186%	103%
2024	20,640,829	66,904,420	324%	114%	30,485,678	61,759,471	203%	107%
2025	19,043,815	70,287,265	369%	122%	28,126,953	64,882,174	231%	112%
2026	17,445,518	73,299,368	420%	130%	25,766,332	67,662,646	263%	118%
2027	15,860,057	75,892,455	479%	138%	23,424,670	70,056,325	299%	123%
2028	14,299,780	77,728,040	544%	146%	21,120,203	71,750,754	340%	129%
2029	12,779,866	78,716,521	616%	155%	18,875,351	72,663,221	385%	136%
2030	11,337,283	78,839,579	695%	163%	16,744,713	72,776,815	435%	142%
2031	9,987,290	78,007,930	781%	171%	14,750,828	72,009,121	488%	148%
2032	8,735,112	76,249,064	873%	180%	12,901,412	70,385,511	546%	154%
2033	7,584,790	73,729,395	972%	188%	11,202,431	68,059,605	608%	160%
2034	6,537,186	70,543,644	1079%	196%	9,655,162	65,118,838	674%	166%
2035	5,591,207	66,770,899	1194%	203%	8,257,989	61,636,217	746%	172%
2036	4,745,762	62,449,293	1316%	210%	7,009,301	57,646,942	822%	177%
2037	3,997,957	57,727,706	1444%	216%	5,904,822	53,288,445	902%	182%
2038	3,341,946	52,743,430	1578%	222%	4,935,921	48,687,460	986%	187%
2039	2,771,758	47,633,344	1719%	227%	4,093,775	43,970,340	1074%	191%
2040	2,281,401	42,517,830	1864%	232%	3,369,538	39,248,209	1165%	194%
2041	1,863,842	37,556,237	2015%	237%	2,752,820	34,668,163	1259%	198%
2042	1,511,654	32,842,373	2173%	240%	2,232,652	30,316,795	1358%	201%
2043	1,217,175	28,480,384	2340%	244%	1,797,718	26,290,243	1462%	203%
2044	973,118	24,458,961	2513%	246%	1,437,256	22,578,067	1571%	206%
2045	772,564	20,780,933	2690%	249%	1,141,045	19,182,879	1681%	207%
2046	609,140	17,461,813	2867%	251%	899,676	16,118,999	1792%	209%
2047	477,260	14,520,524	3042%	252%	704,893	13,403,895	1902%	210%
2048	371,667	11,960,366	3218%	254%	548,937	11,040,614	2011%	211%
2049	287,797	9,752,053	3389%	255%	425,065	9,002,120	2118%	212%
2050	221,672	7,876,593	3553%	256%	327,400	7,270,883	2221%	213%
2051	169,905	6,283,576	3698%	257%	250,942	5,800,369	2311%	214%
2052	129,638	4,961,461	3827%	257%	191,470	4,579,925	2392%	214%
2053	98,528	3,876,140	3934%	258%	145,522	3,578,065	2459%	215%
2054	74,645	3,002,800	4023%	258%	110,248	2,771,885	2514%	215%
2055	56,424	2,305,421	4086%	258%	83,336	2,128,134	2554%	215%
2056	42,597	1,758,786	4129%	259%	62,915	1,623,535	2581%	215%
2057	32,160	1,331,260	4140%	259%	47,499	1,228,886	2587%	215%
2058	24,323	1,003,226	4125%	259%	35,924	926,078	2578%	215%
2059	18,474	759,743	4112%	259%	27,285	701,318	2570%	215%
2060	14,116	583,357	4133%	259%	20,849	538,497	2583%	216%
2061	10,884	454,810	4179%	259%	16,076	419,835	2612%	216%
2062	8,481	361,870	4267%	259%	12,526	334,042	2667%	216%
2063	6,676	292,197	4377%	259%	9,860	269,727	2736%	216%
2064	5,315	241,442	4542%	259%	7,850	222,875	2839%	216%
2065	4,275	207,377	4851%	259%	6,314	191,429	3032%	216%
2066	3,470	182,059	5247%	259%	5,125	168,058	3279%	216%
2067	2,835	163,862	5780%	259%	4,187	151,261	3612%	216%
2068	2,320	148,203	6389%	259%	3,426	136,807	3993%	216%
2069	1,899	133,292	7017%	259%	2,805	123,042	4386%	216%
2070	1,552	120,066	7737%	259%	2,292	110,833	4835%	216%
2071	1,249	105,845	8473%	259%	1,845	97,705	5296%	216%
2072	994	90,611	9117%	259%	1,468	83,643	5698%	216%
2073	779	77,173	9913%	259%	1,150	71,238	6195%	216%
2074	599	64,728	10808%	259%	885	59,751	6755%	216%
2075	453	52,511	11587%	259%	669	48,473	7242%	216%
2076	333	40,228	12064%	259%	492	37,134	7540%	216%
2077	238	28,048	11787%	259%	351	25,891	7367%	216%
2078	165	18,069	10927%	259%	244	16,680	6829%	216%
2079	112	11,314	10132%	259%	165	10,444	6332%	216%
Total Projected	247,145,536	1,566,340,853	634%	634%	354,578,635	1,455,644,272	411%	411%
Total Lifetime	785,897,600	2,038,600,284	259%	259%	893,330,699	1,927,903,702	216%	216%
Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates								
Past	920,219,775	641,235,522	70%	70%	920,219,775	641,235,522	70%	70%
Future	185,954,310	975,894,767	525%	525%	264,472,629	910,003,964	344%	344%
Lifetime	1,106,174,085	1,617,130,289	146%	146%	1,184,692,404	1,551,239,486	131%	131%

Exhibit 4d
Continental Casualty Company
TQ - Policy Forms with Lifetime Benefits & Standard Inflation
Pennsylvania Specific Experience and Projections

Year	Without Rate Increase				With 60% Cumulative Rate Increase			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1988	-	-	0%	0%	-	-	0%	0%
1989	-	-	0%	0%	-	-	0%	0%
1990	-	-	0%	0%	-	-	0%	0%
1991	-	-	0%	0%	-	-	0%	0%
1992	-	-	0%	0%	-	-	0%	0%
1993	-	-	0%	0%	-	-	0%	0%
1994	-	-	0%	0%	-	-	0%	0%
1995	2,081	-	0%	0%	2,081	-	0%	0%
1996	7,959	-	0%	0%	7,959	-	0%	0%
1997	225,742	-	0%	0%	225,742	-	0%	0%
1998	929,472	-	0%	0%	929,472	-	0%	0%
1999	1,505,394	-	0%	0%	1,505,394	-	0%	0%
2000	1,591,226	581,377	37%	14%	1,591,226	581,377	37%	14%
2001	1,618,863	-	0%	10%	1,618,863	-	0%	10%
2002	1,648,606	4,516	0%	8%	1,648,606	4,516	0%	8%
2003	1,636,724	602,299	37%	13%	1,636,724	602,299	37%	13%
2004	1,610,791	456,799	28%	15%	1,610,791	456,799	28%	15%
2005	1,719,977	199,142	12%	15%	1,719,977	199,142	12%	15%
2006	1,789,667	422,194	24%	16%	1,789,667	422,194	24%	16%
2007	1,810,108	1,049,438	58%	21%	1,810,108	1,049,438	58%	21%
2008	1,768,486	358,530	20%	21%	1,768,486	358,530	20%	21%
2009	1,724,780	247,150	14%	20%	1,724,780	247,150	14%	20%
2010	1,686,378	2,608,861	155%	31%	1,686,378	2,608,861	155%	31%
2011	1,666,226	241,236	14%	30%	1,666,226	241,236	14%	30%
2012	1,698,045	1,392,412	82%	33%	1,698,045	1,392,412	82%	33%
2013	1,805,556	1,385,486	77%	36%	1,805,556	1,385,486	77%	36%
2014	1,809,878	1,476,539	82%	39%	1,809,878	1,476,539	82%	39%
2015	1,773,033	1,889,961	107%	43%	1,773,033	1,889,961	107%	43%
2016	1,725,696	1,757,004	102%	46%	1,725,696	1,757,004	102%	46%
2017	1,852,382	2,610,975	141%	51%	1,852,382	2,610,975	141%	51%
2018	1,835,383	652,582	36%	51%	1,835,383	652,582	36%	51%
2019	1,855,109	2,954,518	159%	56%	1,855,109	2,954,518	159%	56%
2020	1,873,906	5,855,290	312%	68%	1,873,906	5,855,290	312%	68%
Total Actual	39,171,469	26,746,309	68%	68%	39,171,469	26,746,309	68%	68%
Projected								
2021	2,026,311	4,389,475	217%	76%	2,234,564	4,321,965	193%	75%
2022	1,922,682	5,245,855	273%	84%	2,756,004	5,126,929	186%	82%
2023	1,802,835	5,134,030	285%	92%	2,662,716	4,976,184	187%	88%
2024	1,680,813	5,462,880	325%	101%	2,482,493	5,042,785	203%	94%
2025	1,556,557	5,749,172	369%	109%	2,298,972	5,307,061	231%	100%
2026	1,431,586	5,992,515	419%	118%	2,114,396	5,531,690	262%	106%
2027	1,306,889	6,195,597	474%	128%	1,930,223	5,719,156	296%	113%
2028	1,183,633	6,344,527	536%	137%	1,748,179	5,856,633	335%	120%
2029	1,062,877	6,423,301	604%	146%	1,569,827	5,929,349	378%	126%
2030	947,615	6,451,765	681%	156%	1,399,590	5,955,624	426%	133%
2031	839,381	6,397,476	762%	165%	1,239,732	5,905,510	476%	140%
2032	738,590	6,282,791	851%	174%	1,090,868	5,799,645	532%	147%
2033	645,538	6,111,311	947%	183%	953,434	5,641,352	592%	154%
2034	560,255	5,900,319	1053%	191%	827,475	5,446,584	658%	160%
2035	482,809	5,645,465	1169%	200%	713,090	5,211,329	731%	166%
2036	412,992	5,340,183	1293%	207%	609,973	4,929,523	808%	172%
2037	350,688	4,991,330	1423%	215%	517,952	4,607,497	890%	178%
2038	295,511	4,612,739	1561%	222%	436,457	4,258,020	976%	183%
2039	247,087	4,220,062	1708%	228%	364,938	3,895,539	1067%	188%
2040	204,887	3,814,077	1862%	233%	302,610	3,520,774	1163%	192%
2041	168,502	3,398,356	2017%	239%	248,871	3,137,023	1261%	196%
2042	137,449	2,983,894	2171%	243%	203,007	2,754,433	1357%	200%
2043	111,152	2,595,983	2336%	247%	164,167	2,396,352	1460%	203%
2044	89,130	2,238,405	2511%	250%	131,642	2,066,272	1570%	205%
2045	70,793	1,906,632	2693%	253%	104,559	1,760,012	1683%	208%
2046	55,677	1,600,763	2875%	256%	82,233	1,477,665	1797%	210%
2047	43,421	1,321,004	3042%	258%	64,132	1,219,419	1901%	211%
2048	33,592	1,077,963	3209%	259%	49,614	995,068	2006%	213%
2049	25,780	866,180	3360%	261%	38,076	799,571	2100%	214%
2050	19,654	682,342	3472%	262%	29,028	629,870	2170%	214%
2051	14,919	525,742	3524%	263%	22,034	485,312	2203%	215%
2052	11,318	399,620	3531%	263%	16,716	368,890	2207%	216%
2053	8,606	303,707	3529%	264%	12,711	280,352	2206%	216%
2054	6,573	229,180	3487%	264%	9,708	211,556	2179%	216%
2055	5,069	170,779	3369%	264%	7,486	157,646	2106%	216%
2056	3,967	126,451	3188%	265%	5,859	116,727	1992%	217%
2057	3,155	95,313	3021%	265%	4,659	87,984	1888%	217%
2058	2,556	73,879	2891%	265%	3,775	68,198	1807%	217%
2059	2,110	61,058	2893%	265%	3,117	56,363	1808%	217%
2060	1,772	56,334	3179%	265%	2,617	52,002	1987%	217%
2061	1,512	53,667	3549%	265%	2,233	49,540	2218%	217%
2062	1,299	53,500	4118%	265%	1,919	49,386	2574%	217%
2063	1,116	50,659	4540%	265%	1,648	46,764	2837%	217%
2064	956	48,409	5064%	265%	1,412	44,687	3165%	217%
2065	813	45,969	5651%	265%	1,201	42,434	3532%	217%
2066	682	41,858	6138%	265%	1,007	38,639	3837%	217%
2067	564	37,587	6661%	266%	833	34,697	4163%	217%
2068	459	33,038	7201%	266%	678	30,498	4501%	217%
2069	366	28,173	7699%	266%	540	26,007	4812%	217%
2070	286	22,695	7924%	266%	423	20,950	4953%	217%
2071	217	17,086	7888%	266%	320	15,772	4930%	217%
2072	158	11,254	7140%	266%	233	10,389	4463%	217%
2073	110	7,197	6527%	266%	163	6,643	4079%	217%
2074	74	4,460	6015%	266%	110	4,117	3759%	217%
2075	48	2,666	5580%	266%	71	2,461	3487%	217%
2076	30	1,545	5235%	266%	44	1,427	3272%	217%
2077	17	872	4994%	266%	26	805	3121%	217%
2078	10	475	4817%	266%	15	438	3010%	217%
2079	5	250	4678%	266%	8	231	2923%	217%
Total Projected	20,523,456	131,879,819	643%	643%	29,470,387	122,529,743	416%	416%
Total Lifetime	59,694,924	158,626,128	266%	266%	68,641,855	149,276,052	217%	217%
Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates								
Past	66,440,887	35,706,112	54%	54%	66,440,887	35,706,112	54%	54%
Future	15,336,399	81,279,420	530%	530%	21,831,165	75,771,768	347%	347%
Lifetime	81,777,286	116,985,532	143%	143%	88,272,052	111,477,879	126%	126%

Exhibit 1e
Continental Casualty Company
TQ - Policy Forms without Lifetime Benefits & with Standard Inflation
State Specific Information
Pennsylvania

12) Average Annualized Premium as of 12/31/2020

	Nationwide	Pennsylvania
Without Increase	\$2,314	\$2,532
With Increase	\$3,124	\$3,418

13) Insured Count and Premium as of 12/31/2020

Insureds Eligible for Rate Increase

	Nationwide	Pennsylvania
Insureds Not on Claim	9,441	957
Insureds on Claim	1,089	84
Total Insureds	10,530	1,041
2020 Annualized Premium	\$24,370,808	\$2,635,695

Insureds Not Eligible for Rate Increase

	Nationwide	Pennsylvania
Non-Forfeiture Insureds Not on Claim	1,525	177
Non-Forfeiture Insureds on Claim	26	1
Paid-Up Limited Pay Insureds Not on Claim	2	0
Paid-Up Limited Pay Insureds on Claim	0	0
Total Non-Forfeiture and Paid-Up Insureds	1,553	178

18) History of Rate Adjustments

SERFF Number	Approval Date	Rate Increase Approved
N/A	11/18/2004	35.0%
CNAB-127154621	9/2/2011	25.0%*
CNAB-130150831	3/23/2016	20.0%
CNAB-131276497	4/3/2018	20.0%**
CNAB-132346264	8/22/2020	8.4%

Implemented over a two-year period (11.8%, 11.8%)
Implemented over a two-year period (9.54%, 9.54%)***

20) Satisfaction of Minimum Loss Ratio Requirements

1) Expected Lifetime Loss Ratio with Increase	100%
2) Minimum Required Loss Ratio	60%
Is 1) Greater than 2)?	Yes

TQ - Policy Forms without Lifetime Benefits & with Standard Inflation
Distribution of Inforce Insureds Eligible for Rate Increase
Pennsylvania

		Nationwide				Pennsylvania			
		Count	% of Count	Premium	% of Premium	Count	% of Count	Premium	% of Premium
Issue Year	1987	0	0%	\$0	0%	0	0%	\$0	0%
	1988	0	0%	\$0	0%	0	0%	\$0	0%
	1989	0	0%	\$0	0%	0	0%	\$0	0%
	1990	0	0%	\$0	0%	0	0%	\$0	0%
	1991	0	0%	\$0	0%	0	0%	\$0	0%
	1992	0	0%	\$0	0%	0	0%	\$0	0%
	1993	2	0%	\$3,013	0%	0	0%	\$0	0%
	1994	40	0%	\$83,605	0%	10	1%	\$20,787	1%
	1995	98	1%	\$222,866	1%	14	1%	\$26,386	1%
	1996	251	2%	\$524,038	2%	36	3%	\$79,980	3%
	1997	3,282	31%	\$7,330,690	30%	288	28%	\$716,964	27%
	1998	4,220	40%	\$9,719,691	40%	342	33%	\$868,740	33%
	1999	1,764	17%	\$4,208,930	17%	214	21%	\$554,318	21%
	2000	339	3%	\$897,446	4%	35	3%	\$104,403	4%
	2001	231	2%	\$593,598	2%	39	4%	\$104,322	4%
	2002	249	2%	\$691,594	3%	51	5%	\$142,681	5%
	2003	54	1%	\$95,337	0%	12	1%	\$17,114	1%
	2004	0	0%	\$0	0%	0	0%	\$0	0%
	2005	0	0%	\$0	0%	0	0%	\$0	0%
	2006	0	0%	\$0	0%	0	0%	\$0	0%
	2007	0	0%	\$0	0%	0	0%	\$0	0%
	2008	0	0%	\$0	0%	0	0%	\$0	0%
	2009	0	0%	\$0	0%	0	0%	\$0	0%
	2010	0	0%	\$0	0%	0	0%	\$0	0%
	2011	0	0%	\$0	0%	0	0%	\$0	0%
2012	0	0%	\$0	0%	0	0%	\$0	0%	
2013	0	0%	\$0	0%	0	0%	\$0	0%	
2014	0	0%	\$0	0%	0	0%	\$0	0%	
2015	0	0%	\$0	0%	0	0%	\$0	0%	
2016	0	0%	\$0	0%	0	0%	\$0	0%	
2017	0	0%	\$0	0%	0	0%	\$0	0%	
2018	0	0%	\$0	0%	0	0%	\$0	0%	
Total		10,530	100%	\$24,370,808	100%	1,041	100%	\$2,635,695	100%

Issue Age	<35	4	0%	\$5,821	0%	0	0%	\$0	0%	
	35-39	23	0%	\$29,747	0%	4	0%	\$8,197	0%	
	40-44	111	1%	\$138,066	1%	7	1%	\$12,561	0%	
	45-49	449	4%	\$605,081	2%	44	4%	\$66,760	3%	
	50-54	1,543	15%	\$2,539,893	10%	170	16%	\$300,500	11%	
	55-59	2,961	28%	\$5,924,728	24%	356	34%	\$793,333	30%	
	60-64	3,191	30%	\$7,924,343	33%	291	28%	\$841,158	32%	
	65-69	1,838	17%	\$5,543,699	23%	140	13%	\$501,812	19%	
	70-74	382	4%	\$1,510,706	6%	28	3%	\$108,859	4%	
	75-79	28	0%	\$148,725	1%	1	0%	\$2,515	0%	
	80+	0	0%	\$0	0%	0	0%	\$0	0%	
	Total		10,530	100%	\$24,370,808	100%	1,041	100%	\$2,635,695	100%

Attained Age	<45	1	0%	\$2,074	0%	0	0%	\$0	0%
	45-49	0	0%	\$0	0%	0	0%	\$0	0%
	50-54	0	0%	\$0	0%	0	0%	\$0	0%
	55-59	14	0%	\$16,559	0%	0	0%	\$0	0%
	60-64	65	1%	\$85,101	0%	10	1%	\$19,766	1%
	65-69	248	2%	\$336,112	1%	23	2%	\$34,194	1%
	70-74	988	9%	\$1,582,920	6%	116	11%	\$198,660	8%
	75-79	2,418	23%	\$4,462,600	18%	268	26%	\$567,090	22%
	80-84	3,266	31%	\$7,404,438	30%	366	35%	\$943,394	36%
	85-89	2,584	25%	\$7,100,112	29%	199	19%	\$640,332	24%
	90+	946	9%	\$3,380,891	14%	59	6%	\$232,259	9%
	Total		10,530	100%	\$24,370,808	100%	1,041	100%	\$2,635,695

Gender	Male	3,987	38%	\$9,395,371	39%	381	37%	\$975,705	37%
	Female	6,543	62%	\$14,975,437	61%	660	63%	\$1,659,990	63%
	Total	10,530	100%	\$24,370,808	100%	1,041	100%	\$2,635,695	100%

Inflation Type	None	0	0%	\$0	0%	0	0%	\$0	0%
	Simple	5,174	49%	\$11,782,969	48%	568	55%	\$1,373,275	52%
	Compound	5,356	51%	\$12,587,839	52%	473	45%	\$1,262,421	48%
	Total	10,530	100%	\$24,370,808	100%	1,041	100%	\$2,635,695	100%

Tax Status	TQ	10,530	100%	\$24,370,808	100%	1,041	100%	\$2,635,695	100%
	NTQ	0	0%	\$0	0%	0	0%	\$0	0%
	Total	10,530	100%	\$24,370,808	100%	1,041	100%	\$2,635,695	100%

Max Benefit	Lifetime	0	0%	\$0	0%	0	0%	\$0	0%
	Not Lifetime	10,530	100%	\$24,370,808	100%	1,041	100%	\$2,635,695	100%
	Total	10,530	100%	\$24,370,808	100%	1,041	100%	\$2,635,695	100%

Cov Type	Facility Only	189	2%	\$331,733	1%	25	2%	\$54,768	2%
	Comprehensive	10,341	98%	\$24,039,074	99%	1,016	98%	\$2,580,928	98%
	Total	10,530	100%	\$24,370,808	100%	1,041	100%	\$2,635,695	100%

Exhibit 3e
Continental Casualty Company
TQ - Policy Forms without Lifetime Benefits & with Standard Inflation
Nationwide Historical and Projected Experience Restated with Approved Pennsylvania Rate Increases

Year	Without Rate Increase				With 35% Cumulative Rate Increase			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1988	-	-	0%	0%	-	-	0%	0%
1989	-	-	0%	0%	-	-	0%	0%
1990	-	-	0%	0%	-	-	0%	0%
1991	-	-	0%	0%	-	-	0%	0%
1992	-	-	0%	0%	-	-	0%	0%
1993	178	-	0%	0%	178	-	0%	0%
1994	18,352	-	0%	0%	18,352	-	0%	0%
1995	113,277	-	0%	0%	113,277	-	0%	0%
1996	305,267	-	0%	0%	305,267	-	0%	0%
1997	5,334,775	21,101	0%	0%	5,334,775	21,101	0%	0%
1998	21,929,861	202,449	1%	1%	21,929,861	202,449	1%	1%
1999	34,077,685	1,186,174	3%	2%	34,077,685	1,186,174	3%	2%
2000	35,122,137	1,749,855	5%	3%	35,122,137	1,749,855	5%	3%
2001	35,157,793	2,313,324	7%	4%	35,157,793	2,313,324	7%	4%
2002	35,177,482	5,660,167	16%	7%	35,177,482	5,660,167	16%	7%
2003	34,790,521	8,809,267	25%	10%	34,790,521	8,809,267	25%	10%
2004	33,695,910	8,153,873	24%	12%	33,695,910	8,153,873	24%	12%
2005	40,920,236	9,168,661	22%	13%	40,920,236	9,168,661	22%	13%
2006	41,034,009	10,459,557	25%	15%	41,034,009	10,459,557	25%	15%
2007	39,560,150	13,335,214	34%	17%	39,560,150	13,335,214	34%	17%
2008	38,331,369	19,398,922	51%	20%	38,331,369	19,398,922	51%	20%
2009	36,984,305	22,700,389	61%	24%	36,984,305	22,700,389	61%	24%
2010	35,253,968	23,668,148	67%	27%	35,253,968	23,668,148	67%	27%
2011	33,935,517	29,390,030	87%	31%	33,935,517	29,390,030	87%	31%
2012	35,108,301	36,258,215	103%	36%	35,108,301	36,258,215	103%	36%
2013	36,450,107	37,842,672	104%	40%	36,450,107	37,842,672	104%	40%
2014	34,571,619	38,248,197	111%	44%	34,571,619	38,248,197	111%	44%
2015	31,654,101	50,787,981	160%	50%	31,654,101	50,787,981	160%	50%
2016	31,379,103	52,300,817	167%	55%	31,379,103	52,300,817	167%	55%
2017	32,463,199	65,843,284	203%	62%	32,463,199	65,843,284	203%	62%
2018	30,129,981	58,727,239	195%	68%	30,129,981	58,727,239	195%	68%
2019	28,615,919	70,586,451	247%	74%	28,615,919	70,586,451	247%	74%
2020	28,744,316	67,593,082	235%	80%	28,744,316	67,593,082	235%	80%
Total Actual	790,859,439	634,405,067	80%	80%	790,859,439	634,405,067	80%	80%
Projected								
2021	28,963,427	61,117,830	211%	85%	30,708,231	60,560,435	197%	85%
2022	26,835,226	70,353,004	262%	90%	33,840,090	70,839,003	209%	90%
2023	24,513,623	66,431,012	271%	96%	31,584,333	66,571,846	211%	94%
2024	22,203,069	68,193,311	307%	101%	28,607,322	65,083,696	228%	98%
2025	19,941,360	69,092,550	346%	106%	25,693,245	65,941,930	257%	102%
2026	17,739,912	69,337,442	391%	112%	22,856,812	66,175,654	290%	107%
2027	15,640,673	68,847,791	440%	117%	20,152,069	65,708,332	326%	111%
2028	13,642,625	67,428,697	494%	122%	17,577,703	64,353,949	366%	116%
2029	11,761,972	65,177,930	554%	128%	15,154,596	62,205,817	410%	120%
2030	10,056,997	62,273,869	619%	133%	12,957,838	59,434,181	459%	124%
2031	8,529,036	58,806,698	689%	137%	10,989,151	56,125,113	511%	128%
2032	7,172,753	54,871,953	765%	142%	9,241,662	52,369,792	567%	132%
2033	5,983,376	50,631,580	846%	146%	7,709,220	48,322,780	627%	136%
2034	4,949,348	46,157,411	933%	150%	6,376,938	44,052,633	691%	139%
2035	4,058,566	41,542,568	1024%	153%	5,229,219	39,648,227	758%	142%
2036	3,298,760	36,883,958	1118%	157%	4,250,254	35,202,049	828%	145%
2037	2,657,684	32,354,735	1217%	159%	3,424,266	30,879,359	902%	147%
2038	2,122,238	28,053,137	1322%	162%	2,734,376	26,773,914	979%	150%
2039	1,679,191	24,016,767	1430%	164%	2,163,537	22,921,602	1059%	151%
2040	1,316,647	20,274,357	1540%	166%	1,696,421	19,349,846	1141%	153%
2041	1,023,220	16,883,816	1650%	167%	1,318,358	16,113,914	1222%	154%
2042	788,380	13,902,083	1763%	168%	1,015,780	13,268,148	1306%	155%
2043	602,260	11,344,276	1884%	169%	775,976	10,826,977	1395%	156%
2044	456,436	9,170,085	2009%	170%	588,090	8,751,929	1488%	157%
2045	343,327	7,346,314	2140%	171%	442,356	7,011,322	1585%	157%
2046	256,497	5,841,435	2277%	171%	330,480	5,575,066	1687%	158%
2047	190,500	4,609,328	2420%	172%	245,448	4,399,143	1792%	158%
2048	140,796	3,623,305	2573%	172%	181,407	3,458,082	1906%	159%
2049	103,602	2,836,674	2738%	172%	133,485	2,707,321	2028%	159%
2050	75,954	2,208,164	2907%	173%	97,863	2,107,472	2154%	159%
2051	55,532	1,705,431	3071%	173%	71,549	1,627,663	2275%	159%
2052	40,514	1,310,195	3234%	173%	52,200	1,250,450	2395%	159%
2053	29,518	1,001,439	3393%	173%	38,032	955,774	2513%	159%
2054	21,498	761,084	3540%	173%	27,699	726,378	2622%	159%
2055	15,663	570,979	3645%	173%	20,181	544,942	2700%	159%
2056	11,434	421,929	3690%	173%	14,733	402,689	2733%	159%
2057	8,387	309,523	3691%	173%	10,806	295,409	2734%	159%
2058	6,188	225,803	3649%	173%	7,973	215,507	2703%	159%
2059	4,608	162,530	3527%	173%	5,937	155,118	2613%	160%
2060	3,475	115,678	3328%	173%	4,478	110,403	2466%	160%
2061	2,661	82,173	3087%	173%	3,429	78,426	2287%	160%
2062	2,080	58,405	2808%	173%	2,680	55,741	2080%	160%
2063	1,664	43,508	2615%	173%	2,143	41,524	1937%	160%
2064	1,362	35,037	2572%	173%	1,755	33,439	1905%	160%
2065	1,140	30,948	2715%	173%	1,469	29,537	2011%	160%
2066	971	30,466	3136%	173%	1,252	29,076	2323%	160%
2067	841	30,575	3636%	173%	1,084	29,181	2693%	160%
2068	732	31,635	4322%	173%	943	30,193	3201%	160%
2069	638	30,959	4851%	173%	822	29,548	3593%	160%
2070	555	30,566	5512%	173%	714	29,173	4083%	160%
2071	476	30,343	6369%	173%	614	28,960	4718%	160%
2072	403	28,348	7028%	173%	520	27,055	5206%	160%
2073	337	26,173	7764%	173%	434	24,979	5751%	160%
2074	277	23,692	8564%	173%	356	22,612	6344%	160%
2075	223	20,800	9345%	173%	287	19,852	6922%	160%
2076	176	17,174	9773%	173%	226	16,391	7239%	160%
2077	134	13,161	9792%	173%	173	12,561	7253%	160%
2078	100	8,865	8847%	173%	129	8,461	6554%	160%
2079	72	5,791	8035%	173%	93	5,527	5952%	160%
Total Projected	237,259,116	1,146,775,293	483%	483%	298,349,239	1,103,576,102	370%	370%
Total Lifetime	1,028,118,555	1,781,180,360	173%	173%	1,089,208,678	1,737,981,169	160%	160%
Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates								
Past	1,380,364,238	849,309,314	62%	62%	1,380,364,238	849,309,314	62%	62%
Future	185,764,140	783,663,830	422%	422%	232,191,917	756,407,627	326%	326%
Lifetime	1,566,128,377	1,632,973,145	104%	104%	1,612,556,155	1,605,716,941	100%	100%

Exhibit 4e
Continental Casualty Company
TQ - Policy Forms without Lifetime Benefits & with Standard Inflation
Pennsylvania Specific Experience and Projections

Year	Without Rate Increase				With 35% Cumulative Rate Increase			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1988	-	-	0%	0%	-	-	0%	0%
1989	-	-	0%	0%	-	-	0%	0%
1990	-	-	0%	0%	-	-	0%	0%
1991	-	-	0%	0%	-	-	0%	0%
1992	-	-	0%	0%	-	-	0%	0%
1993	-	-	0%	0%	-	-	0%	0%
1994	3,498	-	0%	0%	3,498	-	0%	0%
1995	13,951	-	0%	0%	13,951	-	0%	0%
1996	31,039	-	0%	0%	31,039	-	0%	0%
1997	498,302	-	0%	0%	498,302	-	0%	0%
1998	1,785,382	6,389	0%	0%	1,785,382	6,389	0%	0%
1999	2,816,625	175,964	6%	4%	2,816,625	175,964	6%	4%
2000	3,014,718	159,645	5%	4%	3,014,718	159,645	5%	4%
2001	3,109,865	269,151	9%	5%	3,109,865	269,151	9%	5%
2002	3,210,638	259,130	8%	6%	3,210,638	259,130	8%	6%
2003	3,231,781	1,379,655	43%	13%	3,231,781	1,379,655	43%	13%
2004	3,163,400	431,771	14%	13%	3,163,400	431,771	14%	13%
2005	3,396,412	347,316	10%	12%	3,396,412	347,316	10%	12%
2006	3,500,262	1,211,922	35%	15%	3,500,262	1,211,922	35%	15%
2007	3,436,595	629,008	18%	16%	3,436,595	629,008	18%	16%
2008	3,358,413	610,748	18%	16%	3,358,413	610,748	18%	16%
2009	3,204,654	1,980,677	62%	20%	3,204,654	1,980,677	62%	20%
2010	3,100,885	2,053,032	66%	23%	3,100,885	2,053,032	66%	23%
2011	2,989,699	3,135,896	105%	29%	2,989,699	3,135,896	105%	29%
2012	2,960,601	3,044,518	103%	34%	2,960,601	3,044,518	103%	34%
2013	3,012,084	2,459,908	82%	36%	3,012,084	2,459,908	82%	36%
2014	2,987,218	5,587,525	187%	45%	2,987,218	5,587,525	187%	45%
2015	2,856,984	6,134,570	215%	54%	2,856,984	6,134,570	215%	54%
2016	2,670,191	3,386,983	127%	57%	2,670,191	3,386,983	127%	57%
2017	2,755,297	4,313,010	157%	61%	2,755,297	4,313,010	157%	61%
2018	2,584,340	3,836,023	148%	65%	2,584,340	3,836,023	148%	65%
2019	2,545,204	5,965,794	234%	72%	2,545,204	5,965,794	234%	72%
2020	2,427,428	4,793,193	197%	76%	2,427,428	4,793,193	197%	76%
Total Actual	68,665,466	52,171,829	76%	76%	68,665,466	52,171,829	76%	76%
Projected								
2021	2,724,687	5,578,165	205%	81%	2,888,826	5,527,292	191%	81%
2022	2,533,913	6,504,873	257%	87%	3,195,347	6,549,809	205%	86%
2023	2,338,453	6,235,474	267%	92%	3,012,957	6,248,693	207%	91%
2024	2,140,527	6,495,634	303%	98%	2,757,941	6,199,433	225%	95%
2025	1,943,811	6,681,700	344%	104%	2,504,483	6,377,014	255%	100%
2026	1,748,299	6,794,950	389%	110%	2,252,578	6,485,100	288%	105%
2027	1,559,848	6,835,081	438%	116%	2,009,771	6,523,402	325%	110%
2028	1,377,356	6,776,241	492%	122%	1,774,641	6,467,245	364%	115%
2029	1,200,942	6,615,613	551%	128%	1,547,341	6,313,941	408%	120%
2030	1,038,008	6,372,842	614%	134%	1,337,412	6,082,241	455%	125%
2031	889,268	6,056,746	681%	140%	1,145,768	5,780,558	505%	130%
2032	754,762	5,679,733	753%	145%	972,466	5,420,738	557%	134%
2033	634,792	5,265,903	830%	150%	817,891	5,025,778	614%	138%
2034	528,840	4,805,481	909%	154%	681,379	4,586,351	673%	142%
2035	436,319	4,316,298	989%	158%	562,171	4,119,475	733%	146%
2036	356,476	3,814,600	1070%	162%	459,298	3,640,654	793%	149%
2037	288,521	3,327,814	1153%	165%	371,742	3,176,065	854%	151%
2038	231,414	2,874,083	1242%	168%	298,162	2,743,025	920%	154%
2039	183,919	2,456,406	1336%	170%	236,969	2,344,394	989%	156%
2040	144,923	2,072,901	1430%	172%	186,724	1,978,377	1060%	157%
2041	113,305	1,734,569	1531%	174%	145,986	1,655,473	1134%	159%
2042	87,949	1,443,091	1641%	175%	113,317	1,377,286	1215%	160%
2043	67,825	1,198,317	1767%	176%	87,388	1,143,673	1309%	161%
2044	51,974	992,902	1910%	177%	66,965	947,626	1415%	162%
2045	39,599	818,907	2068%	178%	51,021	781,564	1532%	163%
2046	30,015	675,668	2251%	179%	38,672	644,858	1667%	163%
2047	22,643	554,109	2447%	179%	29,175	528,841	1813%	164%
2048	17,008	454,529	2672%	180%	21,914	433,802	1980%	164%
2049	12,705	371,293	2922%	180%	16,369	354,362	2165%	165%
2050	9,431	298,521	3165%	180%	12,151	284,909	2345%	165%
2051	6,959	237,642	3415%	181%	8,967	226,805	2529%	165%
2052	5,101	188,197	3689%	181%	6,573	179,616	2733%	165%
2053	3,710	148,545	4004%	181%	4,780	141,772	2966%	165%
2054	2,663	115,585	4341%	181%	3,430	110,315	3216%	165%
2055	1,874	84,769	4525%	181%	2,414	80,903	3352%	165%
2056	1,289	57,524	4463%	181%	1,661	54,901	3306%	166%
2057	867	37,414	4314%	181%	1,117	35,708	3196%	166%
2058	570	23,513	4125%	181%	734	22,441	3056%	166%
2059	365	14,283	3917%	181%	470	13,631	2901%	166%
2060	227	8,418	3716%	181%	292	8,034	2753%	166%
2061	136	4,827	3548%	181%	175	4,607	2628%	166%
2062	79	2,674	3394%	181%	102	2,552	2514%	166%
2063	44	1,425	3242%	181%	57	1,360	2401%	166%
2064	24	726	3085%	181%	30	693	2285%	166%
2065	12	348	2860%	181%	16	332	2119%	166%
2066	6	151	2508%	181%	8	144	1858%	166%
2067	3	59	2134%	181%	4	57	1581%	166%
2068	1	21	1768%	181%	2	20	1310%	166%
2069	0	6	1424%	181%	1	6	1055%	166%
2070	0	2	1109%	181%	0	1	822%	166%
2071	0	0	832%	181%	0	0	617%	166%
2072	0	0	602%	181%	0	0	446%	166%
2073	0	0	431%	181%	0	0	319%	166%
2074	0	0	423%	181%	0	0	313%	166%
2075	0	0	921%	181%	0	0	683%	166%
2076	0	0	0%	181%	0	0	0%	166%
2077	0	0	0%	181%	0	0	0%	166%
2078	0	-	0%	181%	0	-	0%	166%
2079	0	-	0%	181%	0	-	0%	166%
Total Projected	23,531,460	115,028,573	489%	489%	29,627,657	110,625,876	373%	373%
Total Lifetime	92,196,926	167,200,402	181%	181%	98,293,123	162,797,705	166%	166%
Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates								
Past	119,990,055	70,262,903	59%	59%	119,990,055	70,262,903	59%	59%
Future	18,249,632	77,584,852	425%	425%	22,840,310	74,832,330	328%	328%
Lifetime	138,239,687	147,847,755	107%	107%	142,830,365	145,095,232	102%	102%

Exhibit 1f
Continental Casualty Company
TQ - Policy Forms with Lifetime Benefits & without Standard Inflation
State Specific Information
Pennsylvania

12) Average Annualized Premium as of 12/31/2020

	Nationwide	Pennsylvania
Without Increase	\$2,441	\$2,552
With Increase	\$3,295	\$3,446

13) Insured Count and Premium as of 12/31/2020

Insureds Eligible for Rate Increase

	Nationwide	Pennsylvania
Insureds Not on Claim	1,563	116
Insureds on Claim	260	10
Total Insureds	1,823	126
2020 Annualized Premium	\$4,449,365	\$321,597

Insureds Not Eligible for Rate Increase

	Nationwide	Pennsylvania
Non-Forfeiture Insureds Not on Claim	266	19
Non-Forfeiture Insureds on Claim	9	0
Paid-Up Limited Pay Insureds Not on Claim	1	0
Paid-Up Limited Pay Insureds on Claim	0	0
Total Non-Forfeiture and Paid-Up Insureds	276	19

18) History of Rate Adjustments

SERFF Number	Approval Date	Rate Increase Approved
N/A	11/18/2004	35.0%
CNAB-127154621	9/2/2011	25.0%*
CNAB-130150831	3/23/2016	20.0%
CNAB-131276497	4/3/2018	20.0%**
CNAB-132346264	8/22/2020	8.4%

Implemented over a two-year period (11.8%, 11.8%)
Implemented over a two-year period (9.54%, 9.54%)***

20) Satisfaction of Minimum Loss Ratio Requirements

1) Expected Lifetime Loss Ratio with Increase	99%
2) Minimum Required Loss Ratio	60%
Is 1) Greater than 2)?	Yes

Exhibit 2f
Continental Casualty Company
TQ - Policy Forms with Lifetime Benefits & without Standard Inflation
Distribution of Inforce Insureds Eligible for Rate Increase
Pennsylvania

		Nationwide				Pennsylvania			
		Count	% of Count	Premium	% of Premium	Count	% of Count	Premium	% of Premium
Issue Year	1987	0	0%	\$0	0%	0	0%	\$0	0%
	1988	0	0%	\$0	0%	0	0%	\$0	0%
	1989	0	0%	\$0	0%	0	0%	\$0	0%
	1990	0	0%	\$0	0%	0	0%	\$0	0%
	1991	0	0%	\$0	0%	0	0%	\$0	0%
	1992	0	0%	\$0	0%	0	0%	\$0	0%
	1993	0	0%	\$0	0%	0	0%	\$0	0%
	1994	3	0%	\$5,226	0%	0	0%	\$0	0%
	1995	26	1%	\$66,685	1%	4	3%	\$11,538	4%
	1996	36	2%	\$80,765	2%	1	1%	\$2,527	1%
	1997	589	32%	\$1,419,397	32%	34	27%	\$91,123	28%
	1998	720	39%	\$1,744,284	39%	58	46%	\$138,866	43%
	1999	319	17%	\$783,597	18%	24	19%	\$62,144	19%
	2000	50	3%	\$125,316	3%	3	2%	\$12,521	4%
	2001	35	2%	\$118,049	3%	1	1%	\$1,530	0%
	2002	34	2%	\$83,619	2%	1	1%	\$1,347	0%
	2003	11	1%	\$22,428	1%	0	0%	\$0	0%
	2004	0	0%	\$0	0%	0	0%	\$0	0%
	2005	0	0%	\$0	0%	0	0%	\$0	0%
	2006	0	0%	\$0	0%	0	0%	\$0	0%
	2007	0	0%	\$0	0%	0	0%	\$0	0%
	2008	0	0%	\$0	0%	0	0%	\$0	0%
	2009	0	0%	\$0	0%	0	0%	\$0	0%
	2010	0	0%	\$0	0%	0	0%	\$0	0%
	2011	0	0%	\$0	0%	0	0%	\$0	0%
	2012	0	0%	\$0	0%	0	0%	\$0	0%
	2013	0	0%	\$0	0%	0	0%	\$0	0%
	2014	0	0%	\$0	0%	0	0%	\$0	0%
	2015	0	0%	\$0	0%	0	0%	\$0	0%
	2016	0	0%	\$0	0%	0	0%	\$0	0%
	2017	0	0%	\$0	0%	0	0%	\$0	0%
	2018	0	0%	\$0	0%	0	0%	\$0	0%
	Total	1,823	100%	\$4,449,365	100%	126	100%	\$321,597	100%
Issue Age	<35	3	0%	\$3,259	0%	0	0%	\$0	0%
	35-39	1	0%	\$976	0%	0	0%	\$0	0%
	40-44	34	2%	\$38,433	1%	3	2%	\$3,738	1%
	45-49	82	4%	\$109,850	2%	7	6%	\$7,589	2%
	50-54	223	12%	\$371,044	8%	24	19%	\$39,682	12%
	55-59	477	26%	\$928,221	21%	43	34%	\$94,319	29%
	60-64	551	30%	\$1,439,471	32%	32	25%	\$92,108	29%
	65-69	345	19%	\$1,074,188	24%	13	10%	\$51,685	16%
	70-74	99	5%	\$425,519	10%	4	3%	\$32,476	10%
	75-79	8	0%	\$58,404	1%	0	0%	\$0	0%
	80+	0	0%	\$0	0%	0	0%	\$0	0%
	Total	1,823	100%	\$4,449,365	100%	126	100%	\$321,597	100%
Attained Age	<45	0	0%	\$0	0%	0	0%	\$0	0%
	45-49	2	0%	\$2,039	0%	0	0%	\$0	0%
	50-54	0	0%	\$0	0%	0	0%	\$0	0%
	55-59	1	0%	\$1,221	0%	0	0%	\$0	0%
	60-64	18	1%	\$19,412	0%	2	2%	\$2,758	1%
	65-69	48	3%	\$62,391	1%	4	3%	\$3,782	1%
	70-74	167	9%	\$256,926	6%	14	11%	\$21,803	7%
	75-79	361	20%	\$661,435	15%	36	29%	\$70,099	22%
	80-84	548	30%	\$1,254,676	28%	40	32%	\$100,798	31%
	85-89	458	25%	\$1,329,955	30%	20	16%	\$57,289	18%
	90+	220	12%	\$861,311	19%	10	8%	\$65,068	20%
	Total	1,823	100%	\$4,449,365	100%	126	100%	\$321,597	100%
Gender	Male	638	35%	\$1,589,228	36%	42	33%	\$111,391	35%
	Female	1,185	65%	\$2,860,137	64%	84	67%	\$210,206	65%
	Total	1,823	100%	\$4,449,365	100%	126	100%	\$321,597	100%
Inflation Type	None	1,823	100%	\$4,449,365	100%	126	100%	\$321,597	100%
	Simple	0	0%	\$0	0%	0	0%	\$0	0%
	Compound	0	0%	\$0	0%	0	0%	\$0	0%
	Total	1,823	100%	\$4,449,365	100%	126	100%	\$321,597	100%
Tax Status	TQ	1,823	100%	\$4,449,365	100%	126	100%	\$321,597	100%
	NTQ	0	0%	\$0	0%	0	0%	\$0	0%
	Total	1,823	100%	\$4,449,365	100%	126	100%	\$321,597	100%
Max Benefit	Lifetime	1,823	100%	\$4,449,365	100%	126	100%	\$321,597	100%
	Not Lifetime	0	0%	\$0	0%	0	0%	\$0	0%
	Total	1,823	100%	\$4,449,365	100%	126	100%	\$321,597	100%
Cov Type	Facility Only	80	4%	\$154,040	3%	5	4%	\$9,715	3%
	Comprehensive	1,743	96%	\$4,295,326	97%	121	96%	\$311,882	97%
	Total	1,823	100%	\$4,449,365	100%	126	100%	\$321,597	100%

Exhibit 3f
Continental Casualty Company
TQ - Policy Forms with Lifetime Benefits & without Standard Inflation
Nationwide Historical and Projected Experience Restated with Approved Pennsylvania Rate Increases

Year	Without Rate Increase				With 35% Cumulative Rate Increase			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1988	-	-	0%	0%	-	-	0%	0%
1989	-	-	0%	0%	-	-	0%	0%
1990	-	-	0%	0%	-	-	0%	0%
1991	-	-	0%	0%	-	-	0%	0%
1992	-	-	0%	0%	-	-	0%	0%
1993	-	-	0%	0%	-	-	0%	0%
1994	5,497	-	0%	0%	5,497	-	0%	0%
1995	20,523	-	0%	0%	20,523	-	0%	0%
1996	79,946	-	0%	0%	79,946	-	0%	0%
1997	1,417,180	422,937	30%	28%	1,417,180	422,937	30%	28%
1998	5,872,017	1,076,240	18%	20%	5,872,017	1,076,240	18%	20%
1999	8,704,592	1,518,074	17%	19%	8,704,592	1,518,074	17%	19%
2000	8,921,621	2,143,431	24%	21%	8,921,621	2,143,431	24%	21%
2001	8,775,283	5,864,155	67%	33%	8,775,283	5,864,155	67%	33%
2002	8,593,837	4,281,308	50%	36%	8,593,837	4,281,308	50%	36%
2003	8,426,666	3,138,027	37%	36%	8,426,666	3,138,027	37%	36%
2004	8,137,050	6,230,138	77%	42%	8,137,050	6,230,138	77%	42%
2005	9,544,307	5,982,287	63%	45%	9,544,307	5,982,287	63%	45%
2006	9,804,328	6,108,563	62%	47%	9,804,328	6,108,563	62%	47%
2007	9,261,594	7,112,728	77%	50%	9,261,594	7,112,728	77%	50%
2008	8,865,145	8,031,265	91%	54%	8,865,145	8,031,265	91%	54%
2009	8,449,792	6,161,705	73%	55%	8,449,792	6,161,705	73%	55%
2010	7,895,756	5,965,659	76%	57%	7,895,756	5,965,659	76%	57%
2011	7,469,753	7,915,712	106%	60%	7,469,753	7,915,712	106%	60%
2012	7,719,229	8,434,017	109%	63%	7,719,229	8,434,017	109%	63%
2013	7,846,111	8,609,186	110%	66%	7,846,111	8,609,186	110%	66%
2014	7,349,290	10,767,449	147%	70%	7,349,290	10,767,449	147%	70%
2015	6,600,805	11,863,107	180%	75%	6,600,805	11,863,107	180%	75%
2016	6,480,411	10,841,471	167%	78%	6,480,411	10,841,471	167%	78%
2017	6,627,265	9,028,345	136%	81%	6,627,265	9,028,345	136%	81%
2018	6,127,449	8,623,033	141%	83%	6,127,449	8,623,033	141%	83%
2019	5,402,868	7,383,117	137%	85%	5,402,868	7,383,117	137%	85%
2020	5,120,740	8,110,654	158%	87%	5,120,740	8,110,654	158%	87%
Total Actual	179,519,057	155,612,607	87%	87%	179,519,057	155,612,607	87%	87%
Projected								
2021	5,054,526	13,095,852	259%	91%	5,359,019	12,976,418	242%	91%
2022	4,560,121	14,094,926	309%	97%	5,750,460	14,192,294	247%	96%
2023	4,064,427	12,483,113	307%	101%	5,236,770	12,509,577	239%	100%
2024	3,595,569	12,045,465	335%	105%	4,632,674	11,496,191	248%	103%
2025	3,153,910	11,485,504	364%	109%	4,063,624	10,961,765	270%	106%
2026	2,742,027	10,875,010	397%	113%	3,532,937	10,379,110	294%	110%
2027	2,361,723	10,203,834	432%	117%	3,042,939	9,738,539	320%	113%
2028	2,013,563	9,456,902	470%	120%	2,594,355	9,025,667	348%	116%
2029	1,699,167	8,649,528	509%	124%	2,189,275	8,255,110	377%	118%
2030	1,422,632	7,826,365	550%	126%	1,832,976	7,469,483	408%	121%
2031	1,182,737	7,010,879	593%	129%	1,523,886	6,691,183	439%	123%
2032	976,586	6,213,062	636%	131%	1,258,272	5,929,747	471%	125%
2033	800,655	5,458,411	682%	133%	1,031,596	5,209,508	505%	127%
2034	651,610	4,745,403	728%	135%	839,561	4,529,012	539%	128%
2035	526,562	4,081,119	775%	137%	678,443	3,895,020	574%	129%
2036	422,460	3,470,441	821%	138%	544,314	3,312,189	609%	131%
2037	336,504	2,914,029	866%	139%	433,565	2,781,150	641%	132%
2038	266,146	2,414,670	907%	140%	342,913	2,304,561	672%	132%
2039	209,060	1,976,592	945%	141%	269,361	1,886,459	700%	133%
2040	163,204	1,602,183	982%	142%	210,278	1,529,123	727%	134%
2041	126,622	1,287,191	1017%	142%	163,144	1,228,495	753%	134%
2042	97,702	1,023,988	1048%	143%	125,884	977,294	776%	135%
2043	75,003	806,637	1075%	143%	96,637	769,854	797%	135%
2044	57,314	628,198	1096%	143%	73,846	599,552	812%	135%
2045	43,646	483,990	1109%	143%	56,235	461,920	821%	135%
2046	33,160	367,494	1108%	144%	42,725	350,736	821%	135%
2047	25,165	275,751	1096%	144%	32,424	263,177	812%	135%
2048	19,109	205,583	1076%	144%	24,621	196,209	797%	135%
2049	14,542	152,242	1047%	144%	18,736	145,300	775%	136%
2050	11,118	112,185	1009%	144%	14,324	107,069	747%	136%
2051	8,555	82,191	961%	144%	11,023	78,443	712%	136%
2052	6,639	59,681	899%	144%	8,554	56,960	666%	136%
2053	5,211	42,655	819%	144%	6,713	40,710	606%	136%
2054	4,149	30,305	730%	144%	5,346	28,923	541%	136%
2055	3,356	21,794	649%	144%	4,324	20,801	481%	136%
2056	2,754	16,371	594%	144%	3,549	15,624	440%	136%
2057	2,292	13,187	575%	144%	2,953	12,586	426%	136%
2058	1,929	11,221	582%	144%	2,486	10,709	431%	136%
2059	1,633	10,036	614%	144%	2,105	9,578	455%	136%
2060	1,385	8,894	642%	144%	1,785	8,489	476%	136%
2061	1,177	7,895	671%	144%	1,516	7,535	497%	136%
2062	996	7,095	713%	144%	1,283	6,771	528%	136%
2063	835	6,227	746%	144%	1,076	5,943	552%	136%
2064	694	5,337	770%	144%	894	5,093	570%	136%
2065	569	4,557	801%	144%	733	4,349	593%	136%
2066	459	3,834	835%	144%	591	3,659	619%	136%
2067	362	3,152	870%	144%	467	3,008	644%	136%
2068	278	2,474	889%	144%	358	2,361	659%	136%
2069	208	1,817	874%	144%	268	1,735	647%	136%
2070	152	1,295	853%	144%	196	1,236	632%	136%
2071	107	889	827%	144%	138	848	613%	136%
2072	73	572	780%	144%	95	546	578%	136%
2073	49	343	705%	144%	63	327	523%	136%
2074	31	200	640%	144%	40	191	474%	136%
2075	19	113	581%	144%	25	107	430%	136%
2076	12	61	526%	144%	15	58	390%	136%
2077	7	32	478%	144%	9	31	354%	136%
2078	4	16	436%	144%	5	16	323%	136%
2079	2	8	396%	144%	3	8	293%	136%
Total Projected	36,750,507	155,788,800	424%	424%	46,072,406	150,498,358	327%	327%
Total Lifetime	216,269,564	311,401,407	144%	144%	225,591,463	306,110,965	136%	136%
Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates								
Past	320,962,481	241,605,783	75%	75%	320,962,481	241,605,783	75%	75%
Future	29,290,913	114,981,534	393%	393%	36,494,261	111,432,144	305%	305%
Lifetime	350,253,394	356,587,317	102%	102%	357,456,742	353,037,927	99%	99%

Exhibit 4f
Continental Casualty Company
TQ - Policy Forms with Lifetime Benefits & without Standard Inflation
Pennsylvania Specific Experience and Projections

Year	Without Rate Increase				With 35% Cumulative Rate Increase			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1988	-	-	0%	0%	-	-	0%	0%
1989	-	-	0%	0%	-	-	0%	0%
1990	-	-	0%	0%	-	-	0%	0%
1991	-	-	0%	0%	-	-	0%	0%
1992	-	-	0%	0%	-	-	0%	0%
1993	-	-	0%	0%	-	-	0%	0%
1994	-	-	0%	0%	-	-	0%	0%
1995	(3,242)	-	0%	0%	(3,242)	-	0%	0%
1996	13,840	-	0%	0%	13,840	-	0%	0%
1997	99,961	-	0%	0%	99,961	-	0%	0%
1998	316,367	315,829	100%	74%	316,367	315,829	100%	74%
1999	504,703	447,574	89%	82%	504,703	447,574	89%	82%
2000	525,008	-	0%	52%	525,008	-	0%	52%
2001	515,637	730,178	142%	76%	515,637	730,178	142%	76%
2002	512,168	131,001	26%	65%	512,168	131,001	26%	65%
2003	479,026	137,782	29%	59%	479,026	137,782	29%	59%
2004	470,153	11,685	2%	52%	470,153	11,685	2%	52%
2005	501,483	313,168	62%	53%	501,483	313,168	62%	53%
2006	515,203	172,133	33%	51%	515,203	172,133	33%	51%
2007	492,282	159,286	32%	49%	492,282	159,286	32%	49%
2008	471,516	309,145	66%	50%	471,516	309,145	66%	50%
2009	450,888	353,405	78%	53%	450,888	353,405	78%	53%
2010	425,843	276,155	65%	53%	425,843	276,155	65%	53%
2011	410,131	213,193	52%	53%	410,131	213,193	52%	53%
2012	407,897	391,382	96%	56%	407,897	391,382	96%	56%
2013	419,978	359,736	86%	57%	419,978	359,736	86%	57%
2014	410,453	423,849	103%	60%	410,453	423,849	103%	60%
2015	374,623	806,262	215%	67%	374,623	806,262	215%	67%
2016	360,398	248,174	69%	67%	360,398	248,174	69%	67%
2017	386,471	248,210	64%	67%	386,471	248,210	64%	67%
2018	369,896	517,730	140%	70%	369,896	517,730	140%	70%
2019	352,799	99,658	28%	68%	352,799	99,658	28%	68%
2020	303,648	445,244	147%	70%	303,648	445,244	147%	70%
Total Actual	10,087,131	7,110,777	70%	70%	10,087,131	7,110,777	70%	70%
Projected								
2021	308,809	845,589	274%	77%	327,413	837,877	256%	76%
2022	282,729	939,970	332%	83%	356,530	946,463	265%	83%
2023	256,115	859,513	336%	89%	329,988	861,335	261%	88%
2024	230,648	859,209	373%	95%	297,176	820,029	276%	93%
2025	206,285	848,738	411%	101%	265,785	810,035	305%	98%
2026	183,115	833,218	455%	106%	235,933	795,224	337%	102%
2027	161,047	807,869	502%	112%	207,499	771,031	372%	107%
2028	140,253	770,261	549%	117%	180,707	735,137	407%	111%
2029	120,799	724,291	600%	122%	155,642	691,264	444%	116%
2030	103,052	668,486	649%	126%	132,776	638,003	481%	119%
2031	87,094	609,757	700%	130%	112,216	581,952	519%	123%
2032	72,906	546,692	750%	134%	93,934	521,763	555%	126%
2033	60,459	483,334	799%	137%	77,898	461,294	592%	129%
2034	49,626	421,675	850%	140%	63,940	402,447	629%	131%
2035	40,302	362,591	900%	143%	51,926	346,057	666%	134%
2036	32,401	308,439	952%	145%	41,747	294,374	705%	135%
2037	25,759	258,498	1004%	147%	33,190	246,710	743%	137%
2038	20,250	213,863	1056%	148%	26,091	204,111	782%	138%
2039	15,767	173,456	1100%	149%	20,315	165,547	815%	139%
2040	12,158	140,136	1153%	150%	15,665	133,746	854%	140%
2041	9,282	112,735	1215%	151%	11,960	107,594	900%	141%
2042	7,026	89,626	1276%	152%	9,052	85,539	945%	141%
2043	5,279	71,739	1359%	152%	6,801	68,468	1007%	142%
2044	3,943	56,482	1432%	153%	5,081	53,906	1061%	142%
2045	2,935	44,634	1521%	153%	3,782	42,598	1126%	142%
2046	2,176	34,717	1595%	153%	2,804	33,134	1182%	143%
2047	1,607	26,613	1656%	153%	2,071	25,399	1227%	143%
2048	1,183	20,426	1726%	154%	1,524	19,495	1279%	143%
2049	868	15,440	1779%	154%	1,118	14,736	1318%	143%
2050	634	11,595	1830%	154%	816	11,066	1355%	143%
2051	459	8,665	1888%	154%	591	8,270	1398%	143%
2052	329	6,251	1902%	154%	423	5,966	1409%	143%
2053	231	4,289	1855%	154%	298	4,093	1374%	143%
2054	160	2,768	1732%	154%	206	2,641	1283%	143%
2055	108	1,642	1523%	154%	139	1,567	1128%	143%
2056	71	945	1337%	154%	91	902	991%	143%
2057	45	529	1184%	154%	58	505	877%	143%
2058	27	289	1061%	154%	35	275	786%	143%
2059	16	153	966%	154%	20	146	716%	143%
2060	9	79	899%	154%	11	75	666%	143%
2061	5	39	846%	154%	6	38	627%	143%
2062	2	19	801%	154%	3	18	593%	143%
2063	1	9	749%	154%	1	8	555%	143%
2064	1	4	693%	154%	1	3	514%	143%
2065	0	1	621%	154%	0	1	460%	143%
2066	0	0	548%	154%	0	0	406%	143%
2067	0	0	480%	154%	0	0	355%	143%
2068	0	0	409%	154%	0	0	303%	143%
2069	0	0	337%	154%	0	0	250%	143%
2070	0	0	246%	154%	0	0	182%	143%
2071	0	0	119%	154%	0	0	88%	143%
2072	0	0	39%	154%	0	0	29%	143%
2073	0	0	1%	154%	0	0	1%	143%
2074	0	0	0%	154%	0	0	0%	143%
2075	0	0	0%	154%	0	0	0%	143%
2076	0	-	0%	154%	0	-	0%	143%
2077	0	-	0%	154%	0	-	0%	143%
2078	0	-	0%	154%	0	-	0%	143%
2079	0	-	0%	154%	0	-	0%	143%
Total Projected	2,445,968	12,185,271	498%	498%	3,073,265	11,750,841	382%	382%
Total Lifetime	12,533,099	19,296,048	154%	154%	13,160,395	18,861,618	143%	143%
Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates								
Past	18,053,080	11,854,529	66%	66%	18,053,080	11,854,529	66%	66%
Future	1,925,475	8,777,475	456%	456%	2,404,670	8,490,342	353%	353%
Lifetime	19,978,555	20,632,004	103%	103%	20,457,750	20,344,871	99%	99%

Exhibit 1a
Continental Casualty Company
Preferred Advantage - Policy Forms with Lifetime Benefits & Standard Inflation
State Specific Information
Pennsylvania

12) Average Annualized Premium as of 12/31/2020

	Nationwide	Pennsylvania
Without Increase	\$3,178	\$3,958
With Increase	\$5,085	\$6,332

13) Insured Count and Premium as of 12/31/2020

Insureds Eligible for Rate Increase

	Nationwide	Pennsylvania
Insureds Not on Claim	4,186	289
Insureds on Claim	595	23
Total Insureds	4,781	312
2020 Annualized Premium	\$15,194,589	\$1,234,820

Insureds Not Eligible for Rate Increase

	Nationwide	Pennsylvania
Non-Forfeiture Insureds Not on Claim	445	29
Non-Forfeiture Insureds on Claim	10	1
Paid-Up Limited Pay Insureds Not on Claim	0	0
Paid-Up Limited Pay Insureds on Claim	0	0
Total Non-Forfeiture and Paid-Up Insureds	455	30

18) History of Rate Adjustments

SERFF Number	Approval Date	Rate Increase Approved
N/A	7/10/2003	50.0%
CNAB-127154621	9/2/2011	25.0%*
CNAB-130150831	3/23/2016	20.0%
CNAB-131276497	4/3/2018	20.0%**
CNAB-132346264	8/22/2020	8.4%

Implemented over a two-year period (11.8%, 11.8%)
Implemented over a two-year period (9.54%, 9.54%)***

20) Satisfaction of Minimum Loss Ratio Requirements

1) Expected Lifetime Loss Ratio with Increase	136%
2) Minimum Required Loss Ratio	60%
Is 1) Greater than 2)?	Yes

Preferred Advantage - Policy Forms with Lifetime Benefits & Standard Inflation
Distribution of Inforce Insureds Eligible for Rate Increase
Pennsylvania

8	3%	\$22,331	2%
304	97%	\$1,212,489	98%
312	100%	\$1,234,820	100%

Exhibit 3a
Continental Casualty Company
Preferred Advantage - Policy Forms with Lifetime Benefits & Standard Inflation
Nationwide Historical and Projected Experience Restated with Approved Pennsylvania Rate Increases

Year	Without Rate Increase				With 60% Cumulative Rate Increase			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1988	-	-	0%	0%	-	-	0%	0%
1989	-	-	0%	0%	-	-	0%	0%
1990	-	-	0%	0%	-	-	0%	0%
1991	-	-	0%	0%	-	-	0%	0%
1992	-	-	0%	0%	-	-	0%	0%
1993	-	-	0%	0%	-	-	0%	0%
1994	11,507	-	0%	0%	11,507	-	0%	0%
1995	1,484,582	53,457	4%	4%	1,484,582	53,457	4%	4%
1996	7,240,570	454,360	6%	6%	7,240,570	454,360	6%	6%
1997	15,336,337	1,938,742	13%	10%	15,336,337	1,938,742	13%	10%
1998	17,559,418	2,061,341	12%	11%	17,559,418	2,061,341	12%	11%
1999	17,590,794	2,877,064	16%	12%	17,590,794	2,877,064	16%	12%
2000	17,185,180	5,254,984	31%	17%	17,185,180	5,254,984	31%	17%
2001	16,669,041	6,988,228	42%	21%	16,669,041	6,988,228	42%	21%
2002	16,249,784	4,256,177	26%	22%	16,249,784	4,256,177	26%	22%
2003	15,837,037	7,144,016	45%	25%	15,837,037	7,144,016	45%	25%
2004	22,702,998	7,054,321	31%	26%	22,702,998	7,054,321	31%	26%
2005	22,405,588	11,897,795	53%	29%	22,405,588	11,897,795	53%	29%
2006	20,406,606	12,784,964	63%	33%	20,406,606	12,784,964	63%	33%
2007	20,021,377	12,340,215	62%	36%	20,021,377	12,340,215	62%	36%
2008	19,413,946	13,465,167	69%	38%	19,413,946	13,465,167	69%	38%
2009	18,787,773	20,925,118	111%	44%	18,787,773	20,925,118	111%	44%
2010	17,966,585	19,921,652	111%	48%	17,966,585	19,921,652	111%	48%
2011	17,432,663	15,207,833	87%	51%	17,432,663	15,207,833	87%	51%
2012	18,664,322	23,719,390	127%	56%	18,664,322	23,719,390	127%	56%
2013	19,846,510	24,196,139	122%	60%	19,846,510	24,196,139	122%	60%
2014	19,142,435	24,305,443	127%	63%	19,142,435	24,305,443	127%	63%
2015	17,744,886	35,390,865	199%	70%	17,744,886	35,390,865	199%	70%
2016	17,753,745	32,153,741	181%	75%	17,753,745	32,153,741	181%	75%
2017	18,785,940	43,589,722	232%	83%	18,785,940	43,589,722	232%	83%
2018	17,692,254	46,172,900	261%	90%	17,692,254	46,172,900	261%	90%
2019	17,534,674	45,519,801	260%	97%	17,534,674	45,519,801	260%	97%
2020	18,865,706	42,726,782	226%	103%	18,865,706	42,726,782	226%	103%
Total Actual	450,332,257	462,400,217	103%	103%	450,332,257	462,400,217	103%	103%
Projected								
2021	18,624,980	51,191,446	275%	110%	20,539,151	50,404,121	245%	109%
2022	17,348,681	59,185,472	341%	118%	24,867,887	57,843,708	233%	115%
2023	15,959,212	56,330,103	353%	125%	23,571,117	54,598,234	232%	120%
2024	14,584,080	58,325,762	400%	133%	21,540,103	53,840,511	250%	126%
2025	13,229,495	59,705,566	451%	141%	19,539,435	55,114,208	282%	131%
2026	11,909,460	60,663,080	509%	149%	17,589,797	55,998,090	318%	137%
2027	10,634,827	61,253,970	576%	157%	15,707,213	56,543,540	360%	143%
2028	9,414,892	61,251,815	651%	166%	13,905,420	56,541,550	407%	149%
2029	8,258,991	60,373,976	731%	174%	12,198,199	55,731,217	457%	155%
2030	7,188,078	58,824,051	818%	182%	10,616,503	54,300,482	511%	161%
2031	6,212,862	56,652,155	912%	190%	9,176,148	52,295,605	570%	167%
2032	5,331,730	54,055,460	1014%	197%	7,874,752	49,898,595	634%	172%
2033	4,542,000	51,112,828	1125%	204%	6,708,352	47,182,251	703%	178%
2034	3,840,687	47,729,225	1243%	211%	5,672,542	44,058,847	777%	183%
2035	3,223,496	44,055,396	1367%	217%	4,760,975	40,667,536	854%	188%
2036	2,685,320	40,129,953	1494%	223%	3,966,110	37,043,959	934%	192%
2037	2,220,034	36,181,880	1630%	228%	3,278,901	33,399,493	1019%	196%
2038	1,821,480	32,242,936	1770%	232%	2,690,253	29,763,454	1106%	200%
2039	1,483,115	28,349,477	1911%	237%	2,190,502	26,169,402	1195%	203%
2040	1,198,540	24,623,406	2054%	240%	1,770,196	22,729,866	1284%	206%
2041	961,325	21,153,593	2200%	243%	1,419,839	19,526,882	1375%	208%
2042	765,443	18,017,088	2354%	246%	1,130,528	16,631,574	1471%	210%
2043	605,107	15,180,651	2509%	248%	893,718	14,013,259	1568%	212%
2044	474,988	12,662,246	2666%	250%	701,538	11,688,519	1666%	214%
2045	370,293	10,448,193	2822%	251%	546,909	9,644,727	1763%	215%
2046	286,794	8,566,763	2987%	253%	423,583	7,907,979	1867%	216%
2047	220,572	7,008,631	3177%	254%	325,776	6,469,668	1986%	217%
2048	168,532	5,674,273	3367%	255%	248,915	5,237,921	2104%	217%
2049	127,953	4,563,496	3567%	255%	188,981	4,212,563	2229%	218%
2050	96,498	3,624,182	3756%	256%	142,523	3,345,482	2347%	218%
2051	72,325	2,857,113	3950%	256%	106,822	2,637,401	2469%	219%
2052	53,869	2,243,855	4165%	257%	79,562	2,071,303	2603%	219%
2053	39,891	1,745,056	4375%	257%	58,918	1,610,861	2734%	219%
2054	29,391	1,349,389	4591%	257%	43,409	1,245,621	2869%	219%
2055	21,525	1,037,056	4818%	257%	31,792	957,306	3011%	220%
2056	15,676	785,741	5012%	257%	23,153	725,317	3133%	220%
2057	11,329	589,758	5206%	258%	16,732	544,405	3254%	220%
2058	8,134	433,870	5334%	258%	12,013	400,505	3334%	220%
2059	5,799	311,887	5379%	258%	8,564	287,903	3362%	220%
2060	4,104	220,899	5383%	258%	6,061	203,911	3364%	220%
2061	2,882	155,627	5400%	258%	4,257	143,659	3375%	220%
2062	2,003	110,296	5507%	258%	2,958	101,814	3442%	220%
2063	1,371	78,528	5727%	258%	2,025	72,489	3579%	220%
2064	927	54,964	5931%	258%	1,369	50,738	3707%	220%
2065	620	37,739	6085%	258%	916	34,837	3803%	220%
2066	409	26,111	6377%	258%	605	24,103	3986%	220%
2067	267	17,908	6704%	258%	395	16,531	4190%	220%
2068	171	11,916	6961%	258%	253	11,000	4351%	220%
2069	107	7,368	6854%	258%	159	6,801	4284%	220%
2070	66	4,365	6608%	258%	98	4,030	4130%	220%
2071	40	2,520	6357%	258%	59	2,326	3973%	220%
2072	23	1,411	6090%	258%	34	1,302	3806%	220%
2073	13	767	5830%	258%	19	708	3644%	220%
2074	7	406	5594%	258%	11	374	3496%	220%
2075	4	207	5344%	258%	6	191	3340%	220%
2076	2	102	5126%	258%	3	94	3204%	220%
2077	1	49	4991%	258%	1	45	3119%	220%
2078	0	22	4730%	258%	1	20	2956%	220%
2079	0	9	4166%	258%	0	8	2604%	220%
Total Projected	164,060,422	1,121,222,008	683%	683%	234,586,061	1,043,958,848	445%	445%
Total Lifetime	614,392,679	1,583,622,225	258%	258%	684,918,318	1,506,359,065	220%	220%
Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates								
Past	804,373,104	651,349,029	81%	81%	804,373,104	651,349,029	81%	81%
Future	126,182,637	736,925,922	584%	584%	178,842,060	688,670,585	385%	385%
Lifetime	930,555,741	1,388,274,951	149%	149%	983,215,164	1,340,019,615	136%	136%

Exhibit 4a
Continental Casualty Company
Preferred Advantage - Policy Forms with Lifetime Benefits & Standard Inflation
Pennsylvania Specific Experience and Projections

Year	Without Rate Increase				With 60% Cumulative Rate Increase			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1988	-	-	0%	0%	-	-	0%	0%
1989	-	-	0%	0%	-	-	0%	0%
1990	-	-	0%	0%	-	-	0%	0%
1991	-	-	0%	0%	-	-	0%	0%
1992	-	-	0%	0%	-	-	0%	0%
1993	-	-	0%	0%	-	-	0%	0%
1994	-	-	0%	0%	-	-	0%	0%
1995	153,651	-	0%	0%	153,651	-	0%	0%
1996	565,375	-	0%	0%	565,375	-	0%	0%
1997	1,056,109	2,742	0%	0%	1,056,109	2,742	0%	0%
1998	1,072,016	-	0%	0%	1,072,016	-	0%	0%
1999	1,052,464	624,436	59%	16%	1,052,464	624,436	59%	16%
2000	1,030,471	664,096	64%	26%	1,030,471	664,096	64%	26%
2001	991,048	570,932	58%	31%	991,048	570,932	58%	31%
2002	973,428	-	0%	27%	973,428	-	0%	27%
2003	978,648	456,666	47%	29%	978,648	456,666	47%	29%
2004	1,223,416	294,722	24%	29%	1,223,416	294,722	24%	29%
2005	1,294,524	579,016	45%	31%	1,294,524	579,016	45%	31%
2006	1,208,201	454,210	38%	31%	1,208,201	454,210	38%	31%
2007	1,192,462	429,464	36%	32%	1,192,462	429,464	36%	32%
2008	1,152,812	803,001	70%	35%	1,152,812	803,001	70%	35%
2009	1,080,290	1,227,107	114%	41%	1,080,290	1,227,107	114%	41%
2010	1,054,734	939,189	89%	44%	1,054,734	939,189	89%	44%
2011	1,009,135	1,416,623	140%	50%	1,009,135	1,416,623	140%	50%
2012	1,017,501	355,359	35%	49%	1,017,501	355,359	35%	49%
2013	1,083,193	1,126,919	104%	52%	1,083,193	1,126,919	104%	52%
2014	1,093,531	825,988	76%	53%	1,093,531	825,988	76%	53%
2015	1,064,229	1,245,740	117%	56%	1,064,229	1,245,740	117%	56%
2016	1,036,363	318,832	31%	55%	1,036,363	318,832	31%	55%
2017	1,122,282	1,084,718	97%	57%	1,122,282	1,084,718	97%	57%
2018	1,105,663	714,090	65%	57%	1,105,663	714,090	65%	57%
2019	1,132,258	2,789,704	246%	66%	1,132,258	2,789,704	246%	66%
2020	1,130,210	1,774,447	157%	70%	1,130,210	1,774,447	157%	70%
Total Actual	26,874,016	18,698,000	70%	70%	26,874,016	18,698,000	70%	70%
Projected								
2021	1,210,339	3,546,166	293%	79%	1,334,731	3,491,626	262%	79%
2022	1,126,027	4,045,279	359%	90%	1,614,065	3,953,570	245%	88%
2023	1,035,151	3,831,219	370%	100%	1,528,876	3,713,428	243%	95%
2024	945,510	3,941,955	417%	109%	1,396,481	3,638,819	261%	102%
2025	857,184	4,025,470	470%	119%	1,266,027	3,715,912	294%	109%
2026	770,841	4,086,666	530%	129%	1,138,502	3,772,402	331%	117%
2027	687,536	4,132,396	601%	138%	1,015,463	3,814,615	376%	124%
2028	607,467	4,139,502	681%	148%	897,204	3,821,174	426%	131%
2029	531,497	4,074,738	767%	157%	784,999	3,761,390	479%	138%
2030	461,187	3,960,938	859%	167%	681,154	3,656,342	537%	145%
2031	396,925	3,803,198	958%	175%	586,243	3,510,732	599%	152%
2032	338,758	3,605,646	1064%	184%	500,332	3,328,372	665%	159%
2033	286,575	3,397,890	1186%	192%	423,259	3,136,592	741%	165%
2034	240,254	3,152,448	1312%	199%	354,846	2,910,025	820%	171%
2035	199,542	2,889,936	1448%	206%	294,715	2,667,700	905%	176%
2036	164,190	2,603,450	1586%	212%	242,502	2,403,245	991%	181%
2037	133,811	2,320,775	1734%	218%	197,634	2,142,308	1084%	185%
2038	108,004	2,038,519	1887%	223%	159,517	1,881,756	1180%	189%
2039	86,303	1,762,987	2043%	227%	127,467	1,627,414	1277%	192%
2040	68,318	1,501,509	2198%	230%	100,902	1,386,043	1374%	195%
2041	53,589	1,260,880	2353%	233%	79,148	1,163,918	1471%	198%
2042	41,674	1,044,481	2506%	236%	61,551	964,161	1566%	200%
2043	32,132	852,896	2654%	238%	47,457	787,308	1659%	201%
2044	24,572	687,170	2797%	240%	36,292	634,326	1748%	203%
2045	18,660	544,434	2918%	241%	27,560	502,567	1824%	204%
2046	14,081	429,146	3048%	242%	20,796	396,145	1905%	205%
2047	10,542	340,896	3234%	243%	15,571	314,681	2021%	205%
2048	7,843	265,709	3388%	244%	11,583	245,276	2118%	206%
2049	5,780	207,558	3591%	244%	8,537	191,597	2244%	206%
2050	4,218	157,238	3727%	245%	6,230	145,147	2330%	206%
2051	3,058	117,534	3844%	245%	4,516	108,495	2402%	207%
2052	2,193	88,276	4026%	245%	3,239	81,487	2516%	207%
2053	1,558	65,376	4196%	245%	2,301	60,349	2623%	207%
2054	1,100	48,182	4380%	245%	1,625	44,476	2738%	207%
2055	770	35,549	4616%	246%	1,137	32,815	2885%	207%
2056	534	26,092	4882%	246%	789	24,086	3051%	207%
2057	366	18,909	5167%	246%	541	17,455	3229%	207%
2058	249	12,755	5122%	246%	368	11,774	3201%	207%
2059	168	7,734	4613%	246%	248	7,139	2883%	207%
2060	110	4,601	4171%	246%	163	4,247	2607%	207%
2061	71	2,670	3778%	246%	104	2,465	2362%	207%
2062	44	1,505	3432%	246%	65	1,390	2145%	207%
2063	26	829	3161%	246%	39	765	1976%	207%
2064	15	447	2987%	246%	22	412	1867%	207%
2065	8	233	2871%	246%	12	215	1795%	207%
2066	4	117	2785%	246%	6	108	1741%	207%
2067	2	56	2714%	246%	3	52	1696%	207%
2068	1	26	2615%	246%	1	24	1634%	207%
2069	0	10	2366%	246%	1	10	1479%	207%
2070	0	4	2101%	246%	0	4	1313%	207%
2071	0	1	1867%	246%	0	1	1167%	207%
2072	0	0	1647%	246%	0	0	1030%	207%
2073	0	0	1429%	246%	0	0	893%	207%
2074	0	0	1051%	246%	0	0	657%	207%
2075	0	0	744%	246%	0	0	465%	207%
2076	0	0	165%	246%	0	0	103%	207%
2077	0	0	0%	246%	0	0	0%	207%
2078	0	0	0%	246%	0	0	0%	207%
2079	0	-	0%	246%	0	-	0%	207%
Total Projected	10,478,786	73,082,000	697%	697%	14,974,825	68,076,358	455%	455%
Total Lifetime	37,352,802	91,780,000	246%	246%	41,848,841	86,774,358	207%	207%
Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates								
Past	48,399,052	28,066,981	58%	58%	48,399,052	28,066,981	58%	58%
Future	8,109,265	48,854,574	602%	602%	11,488,129	45,674,829	398%	398%
Lifetime	56,508,317	76,921,555	136%	136%	59,887,181	73,741,810	123%	123%

Exhibit 1b
Continental Casualty Company
Preferred Advantage - Policy Forms without Lifetime Benefits & with Standard Inflation
State Specific Information
Pennsylvania

12) Average Annualized Premium as of 12/31/2020

	Nationwide	Pennsylvania
Without Increase	\$2,314	\$2,526
With Increase	\$3,124	\$3,410

13) Insured Count and Premium as of 12/31/2020

Insureds Eligible for Rate Increase

	Nationwide	Pennsylvania
Insureds Not on Claim	5,394	412
Insureds on Claim	756	61
Total Insureds	6,150	473
2020 Annualized Premium	\$14,229,853	\$1,194,695

Insureds Not Eligible for Rate Increase

	Nationwide	Pennsylvania
Non-Forfeiture Insureds Not on Claim	959	97
Non-Forfeiture Insureds on Claim	26	3
Paid-Up Limited Pay Insureds Not on Claim	0	0
Paid-Up Limited Pay Insureds on Claim	0	0
Total Non-Forfeiture and Paid-Up Insureds	985	100

18) History of Rate Adjustments

SERFF Number	Approval Date	Rate Increase Approved
N/A	7/10/2003	50.0%
CNAB-127154621	9/2/2011	25.0%*
CNAB-130150831	3/23/2016	20.0%
CNAB-131276497	4/3/2018	20.0%**
CNAB-132346264	8/22/2020	8.4%

*Implemented over a two-year period (11.8%, 11.8%)**

*Implemented over a two-year period (9.54%, 9.54%)***

20) Satisfaction of Minimum Loss Ratio Requirements

1) Expected Lifetime Loss Ratio with Increase	104%
2) Minimum Required Loss Ratio	60%
Is 1) Greater than 2)?	Yes

		Nationwide				Pennsylvania			
		Count	% of Count	Premium	% of Premium	Count	% of Count	Premium	% of Premium
Issue Year	1987	0	0%	\$0	0%	0	0%	\$0	0%
	1988	0	0%	\$0	0%	0	0%	\$0	0%
	1989	0	0%	\$0	0%	0	0%	\$0	0%
	1990	0	0%	\$0	0%	0	0%	\$0	0%
	1991	0	0%	\$0	0%	0	0%	\$0	0%
	1992	0	0%	\$0	0%	0	0%	\$0	0%
	1993	0	0%	\$0	0%	0	0%	\$0	0%
	1994	32	1%	\$79,567	1%	4	1%	\$14,029	1%
	1995	829	13%	\$1,927,690	14%	98	21%	\$242,006	20%
	1996	3,814	62%	\$8,774,610	62%	318	67%	\$795,189	67%
	1997	825	13%	\$1,839,390	13%	33	7%	\$87,011	7%
	1998	490	8%	\$1,180,321	8%	16	3%	\$46,591	4%
	1999	134	2%	\$362,883	3%	3	1%	\$9,005	1%
	2000	14	0%	\$35,257	0%	1	0%	\$864	0%
	2001	6	0%	\$19,072	0%	0	0%	\$0	0%
	2002	5	0%	\$9,222	0%	0	0%	\$0	0%
	2003	1	0%	\$1,841	0%	0	0%	\$0	0%
	2004	0	0%	\$0	0%	0	0%	\$0	0%
	2005	0	0%	\$0	0%	0	0%	\$0	0%
	2006	0	0%	\$0	0%	0	0%	\$0	0%
	2007	0	0%	\$0	0%	0	0%	\$0	0%
	2008	0	0%	\$0	0%	0	0%	\$0	0%
	2009	0	0%	\$0	0%	0	0%	\$0	0%
	2010	0	0%	\$0	0%	0	0%	\$0	0%
	2011	0	0%	\$0	0%	0	0%	\$0	0%
	2012	0	0%	\$0	0%	0	0%	\$0	0%
	2013	0	0%	\$0	0%	0	0%	\$0	0%
	2014	0	0%	\$0	0%	0	0%	\$0	0%
2015	0	0%	\$0	0%	0	0%	\$0	0%	
2016	0	0%	\$0	0%	0	0%	\$0	0%	
2017	0	0%	\$0	0%	0	0%	\$0	0%	
2018	0	0%	\$0	0%	0	0%	\$0	0%	
Total	6,150	100%	\$14,229,853	100%	473	100%	\$1,194,695	100%	
Issue Age	<35	3	0%	\$3,175	0%	0	0%	\$0	0%
	35-39	19	0%	\$22,184	0%	0	0%	\$0	0%
	40-44	59	1%	\$86,364	1%	4	1%	\$5,946	0%
	45-49	307	5%	\$425,297	3%	28	6%	\$46,608	4%
	50-54	846	14%	\$1,403,625	10%	78	16%	\$140,857	12%
	55-59	1,631	27%	\$3,260,891	23%	150	32%	\$334,337	28%
	60-64	2,041	33%	\$5,037,415	35%	153	32%	\$441,368	37%
	65-69	1,052	17%	\$3,189,227	22%	54	11%	\$195,612	16%
	70-74	187	3%	\$776,591	5%	6	1%	\$29,969	3%
	75-79	5	0%	\$25,084	0%	0	0%	\$0	0%
	80+	0	0%	\$0	0%	0	0%	\$0	0%
	Total	6,150	100%	\$14,229,853	100%	473	100%	\$1,194,695	100%
Attained Age	<45	0	0%	\$0	0%	0	0%	\$0	0%
	45-49	0	0%	\$0	0%	0	0%	\$0	0%
	50-54	0	0%	\$0	0%	0	0%	\$0	0%
	55-59	5	0%	\$5,565	0%	0	0%	\$0	0%
	60-64	27	0%	\$35,223	0%	0	0%	\$0	0%
	65-69	94	2%	\$129,586	1%	5	1%	\$6,810	1%
	70-74	414	7%	\$631,516	4%	35	7%	\$66,585	6%
	75-79	1,025	17%	\$1,762,256	12%	91	19%	\$159,744	13%
	80-84	1,817	30%	\$3,835,117	27%	157	33%	\$365,767	31%
	85-89	1,903	31%	\$4,893,323	34%	140	30%	\$423,641	35%
	90+	865	14%	\$2,937,267	21%	45	10%	\$172,149	14%
Total	6,150	100%	\$14,229,853	100%	473	100%	\$1,194,695	100%	

Exhibit 3b
Continental Casualty Company
Preferred Advantage - Policy Forms without Lifetime Benefits & with Standard Inflation
Nationwide Historical and Projected Experience Restated with Approved Pennsylvania Rate Increases

Year	Without Rate Increase				With 35% Cumulative Rate Increase			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1988	-	-	0%	0%	-	-	0%	0%
1989	-	-	0%	0%	-	-	0%	0%
1990	-	-	0%	0%	-	-	0%	0%
1991	-	-	0%	0%	-	-	0%	0%
1992	-	-	0%	0%	-	-	0%	0%
1993	-	-	0%	0%	-	-	0%	0%
1994	13,832	-	0%	0%	13,832	-	0%	0%
1995	1,736,563	17,628	1%	1%	1,736,563	17,628	1%	1%
1996	9,963,526	327,051	3%	3%	9,963,526	327,051	3%	3%
1997	21,887,707	928,688	4%	4%	21,887,707	928,688	4%	4%
1998	23,364,277	2,630,290	11%	7%	23,364,277	2,630,290	11%	7%
1999	23,831,198	2,524,812	11%	8%	23,831,198	2,524,812	11%	8%
2000	23,040,394	4,473,518	19%	10%	23,040,394	4,473,518	19%	10%
2001	22,374,811	5,053,831	23%	13%	22,374,811	5,053,831	23%	13%
2002	21,796,491	6,906,546	32%	15%	21,796,491	6,906,546	32%	15%
2003	21,030,108	6,582,966	31%	17%	21,030,108	6,582,966	31%	17%
2004	29,713,532	8,049,251	27%	19%	29,713,532	8,049,251	27%	19%
2005	29,330,001	12,324,831	42%	22%	29,330,001	12,324,831	42%	22%
2006	26,348,223	10,780,840	41%	24%	26,348,223	10,780,840	41%	24%
2007	25,554,001	12,847,096	50%	26%	25,554,001	12,847,096	50%	26%
2008	24,601,554	16,837,313	68%	30%	24,601,554	16,837,313	68%	30%
2009	23,669,446	18,762,252	79%	33%	23,669,446	18,762,252	79%	33%
2010	22,149,675	22,390,582	101%	38%	22,149,675	22,390,582	101%	38%
2011	21,302,094	23,176,224	109%	42%	21,302,094	23,176,224	109%	42%
2012	22,163,839	27,850,882	126%	46%	22,163,839	27,850,882	126%	46%
2013	22,887,495	33,729,250	147%	52%	22,887,495	33,729,250	147%	52%
2014	21,393,807	38,289,204	179%	58%	21,393,807	38,289,204	179%	58%
2015	19,154,290	46,580,854	243%	66%	19,154,290	46,580,854	243%	66%
2016	18,553,664	41,157,554	222%	72%	18,553,664	41,157,554	222%	72%
2017	19,184,368	39,225,705	204%	77%	19,184,368	39,225,705	204%	77%
2018	17,711,053	44,780,647	253%	83%	17,711,053	44,780,647	253%	83%
2019	17,078,086	44,278,814	259%	89%	17,078,086	44,278,814	259%	89%
2020	17,088,788	43,739,316	256%	94%	17,088,788	43,739,316	256%	94%
Total Actual	546,922,821	514,245,944	94%	94%	546,922,821	514,245,944	94%	94%
Projected								
2021	16,773,996	45,567,666	272%	99%	17,784,488	45,152,089	254%	99%
2022	15,258,893	50,721,838	332%	105%	19,241,959	51,072,224	265%	105%
2023	13,635,323	46,331,950	340%	111%	17,568,296	46,430,173	264%	109%
2024	12,050,633	45,929,983	381%	116%	15,526,518	43,835,576	282%	114%
2025	10,552,114	44,875,559	425%	122%	13,595,765	42,829,234	315%	118%
2026	9,153,389	43,347,074	474%	127%	11,793,593	41,370,447	351%	122%
2027	7,863,959	41,487,781	528%	132%	10,132,239	39,595,939	391%	126%
2028	6,679,346	39,113,875	586%	136%	8,605,936	37,330,282	434%	130%
2029	5,601,585	36,330,867	649%	141%	7,217,306	34,674,179	480%	134%
2030	4,658,261	33,384,697	717%	145%	6,001,890	31,862,355	531%	138%
2031	3,842,244	30,368,491	790%	149%	4,950,501	28,983,688	585%	141%
2032	3,145,759	27,399,126	871%	152%	4,053,121	26,149,726	645%	144%
2033	2,556,579	24,502,141	958%	155%	3,293,999	23,384,844	710%	147%
2034	2,063,415	21,701,254	1052%	158%	2,658,586	20,711,677	779%	149%
2035	1,653,763	19,033,978	1151%	161%	2,130,775	18,166,028	853%	151%
2036	1,316,502	16,541,067	1256%	163%	1,696,234	15,786,794	931%	153%
2037	1,040,829	14,257,879	1370%	165%	1,341,046	13,607,720	1015%	155%
2038	817,206	12,167,733	1489%	166%	1,052,921	11,612,884	1103%	156%
2039	637,199	10,278,587	1613%	168%	820,993	9,809,883	1195%	157%
2040	493,462	8,606,274	1744%	169%	635,797	8,213,828	1292%	159%
2041	379,603	7,138,206	1880%	170%	489,096	6,812,704	1393%	159%
2042	289,961	5,881,454	2028%	171%	373,584	5,613,260	1503%	160%
2043	219,887	4,801,233	2184%	171%	283,311	4,582,297	1617%	161%
2044	165,591	3,878,754	2342%	172%	213,354	3,701,882	1735%	161%
2045	123,919	3,116,343	2515%	172%	159,662	2,974,237	1863%	162%
2046	92,212	2,484,226	2694%	173%	118,810	2,370,945	1996%	162%
2047	68,271	1,972,162	2889%	173%	87,963	1,882,231	2140%	162%
2048	50,312	1,561,010	3103%	173%	64,824	1,489,828	2298%	162%
2049	36,934	1,230,839	3333%	173%	47,587	1,174,713	2469%	162%
2050	27,015	970,159	3591%	173%	34,808	925,919	2660%	163%
2051	19,713	761,208	3861%	174%	25,399	726,497	2860%	163%
2052	14,345	594,654	4145%	174%	18,482	567,538	3071%	163%
2053	10,398	460,676	4431%	174%	13,397	439,669	3282%	163%
2054	7,512	353,204	4702%	174%	9,679	337,097	3483%	163%
2055	5,399	268,266	4969%	174%	6,956	256,034	3681%	163%
2056	3,854	199,327	5171%	174%	4,966	190,237	3831%	163%
2057	2,734	145,929	5337%	174%	3,523	139,274	3954%	163%
2058	1,924	105,890	5503%	174%	2,479	101,062	4076%	163%
2059	1,343	76,353	5684%	174%	1,731	72,871	4210%	163%
2060	927	55,400	5975%	174%	1,195	52,874	4426%	163%
2061	631	39,159	6209%	174%	813	37,374	4599%	163%
2062	421	25,855	6138%	174%	543	24,676	4547%	163%
2063	275	16,405	5969%	174%	354	15,657	4422%	163%
2064	175	10,143	5807%	174%	225	9,680	4302%	163%
2065	108	6,071	5627%	174%	139	5,794	4168%	163%
2066	65	3,521	5452%	174%	83	3,360	4038%	163%
2067	37	1,988	5327%	174%	48	1,897	3946%	163%
2068	21	1,087	5229%	174%	27	1,038	3874%	163%
2069	11	573	5129%	174%	14	547	3799%	163%
2070	6	289	5010%	174%	7	276	3711%	163%
2071	3	139	4843%	174%	4	133	3587%	163%
2072	1	62	4475%	174%	2	59	3315%	163%
2073	1	25	3993%	174%	1	23	2958%	163%
2074	0	9	3495%	174%	0	8	2589%	163%
2075	0	3	2987%	174%	0	3	2213%	163%
2076	0	1	2475%	174%	0	1	1833%	163%
2077	0	0	1967%	174%	0	0	1457%	163%
2078	0	0	1472%	174%	0	0	1090%	163%
2079	0	0	995%	174%	0	0	737%	163%
Total Projected	121,318,058	648,108,442	534%	534%	152,065,030	625,091,269	411%	411%
Total Lifetime	668,240,879	1,162,354,387	174%	174%	698,987,851	1,139,337,213	163%	163%
Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates								
Past	1,007,277,212	721,416,227	72%	72%	1,007,277,212	721,416,227	72%	72%
Future	97,098,931	463,555,019	477%	477%	120,970,182	448,516,740	371%	371%
Lifetime	1,104,376,142	1,184,971,246	107%	107%	1,128,247,393	1,169,932,967	104%	104%

Exhibit 4b
Continental Casualty Company
Preferred Advantage - Policy Forms without Lifetime Benefits & with Standard Inflation
Pennsylvania Specific Experience and Projections

Year	Without Rate Increase				With 35% Cumulative Rate Increase			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1988	-	-	0%	0%	-	-	0%	0%
1989	-	-	0%	0%	-	-	0%	0%
1990	-	-	0%	0%	-	-	0%	0%
1991	-	-	0%	0%	-	-	0%	0%
1992	-	-	0%	0%	-	-	0%	0%
1993	-	-	0%	0%	-	-	0%	0%
1994	289	-	0%	0%	289	-	0%	0%
1995	173,592	-	0%	0%	173,592	-	0%	0%
1996	865,368	-	0%	0%	865,368	-	0%	0%
1997	1,787,038	1,558	0%	0%	1,787,038	1,558	0%	0%
1998	1,765,418	401,263	23%	9%	1,765,418	401,263	23%	9%
1999	1,775,900	50,789	3%	7%	1,775,900	50,789	3%	7%
2000	1,745,225	303,359	17%	9%	1,745,225	303,359	17%	9%
2001	1,713,722	96,029	6%	9%	1,713,722	96,029	6%	9%
2002	1,676,279	895,600	53%	15%	1,676,279	895,600	53%	15%
2003	1,654,588	296,899	18%	16%	1,654,588	296,899	18%	16%
2004	1,968,222	317,320	16%	16%	1,968,222	317,320	16%	16%
2005	2,045,293	1,090,859	53%	20%	2,045,293	1,090,859	53%	20%
2006	1,885,307	844,100	45%	23%	1,885,307	844,100	45%	23%
2007	1,862,912	177,633	10%	21%	1,862,912	177,633	10%	21%
2008	1,813,436	1,180,122	65%	25%	1,813,436	1,180,122	65%	25%
2009	1,701,545	1,466,432	86%	29%	1,701,545	1,466,432	86%	29%
2010	1,645,766	470,371	29%	29%	1,645,766	470,371	29%	29%
2011	1,554,223	1,740,721	112%	34%	1,554,223	1,740,721	112%	34%
2012	1,520,098	1,977,481	130%	39%	1,520,098	1,977,481	130%	39%
2013	1,551,851	1,862,756	120%	43%	1,551,851	1,862,756	120%	43%
2014	1,492,774	4,215,430	282%	54%	1,492,774	4,215,430	282%	54%
2015	1,415,771	3,196,157	226%	61%	1,415,771	3,196,157	226%	61%
2016	1,315,433	3,109,391	236%	68%	1,315,433	3,109,391	236%	68%
2017	1,373,421	3,026,432	220%	74%	1,373,421	3,026,432	220%	74%
2018	1,246,158	3,407,816	273%	80%	1,246,158	3,407,816	273%	80%
2019	1,153,462	5,492,301	476%	92%	1,153,462	5,492,301	476%	92%
2020	1,070,539	4,433,724	414%	101%	1,070,539	4,433,724	414%	101%
Total Actual	39,773,632	40,054,546	101%	101%	39,773,632	40,054,546	101%	101%
Projected								
2021	1,166,469	3,282,237	281%	106%	1,236,739	3,252,303	263%	106%
2022	1,076,816	3,724,011	346%	112%	1,357,900	3,749,737	276%	111%
2023	976,043	3,458,943	354%	118%	1,257,573	3,466,276	276%	116%
2024	872,234	3,484,090	399%	123%	1,123,821	3,325,215	296%	120%
2025	767,321	3,463,602	451%	129%	988,646	3,305,662	334%	125%
2026	671,899	3,401,354	506%	134%	865,701	3,246,252	375%	130%
2027	584,620	3,302,261	565%	140%	753,248	3,151,678	418%	134%
2028	502,437	3,157,354	628%	145%	647,359	3,013,379	465%	139%
2029	425,681	2,982,536	701%	150%	548,465	2,846,532	519%	143%
2030	357,805	2,792,897	781%	155%	461,011	2,665,541	578%	147%
2031	296,323	2,585,483	867%	159%	384,372	2,467,585	642%	151%
2032	246,476	2,373,979	963%	164%	317,569	2,265,726	713%	154%
2033	201,910	2,154,558	1067%	167%	260,149	2,056,311	790%	158%
2034	163,887	1,937,244	1182%	171%	211,158	1,848,905	876%	161%
2035	131,887	1,720,033	1304%	174%	169,929	1,641,599	966%	164%
2036	105,132	1,500,221	1427%	177%	135,457	1,431,811	1057%	166%
2037	83,009	1,286,616	1550%	179%	106,952	1,227,946	1148%	168%
2038	64,904	1,092,569	1683%	181%	83,624	1,042,748	1247%	170%
2039	50,197	916,503	1826%	183%	64,676	874,711	1352%	171%
2040	38,355	753,415	1964%	184%	49,418	719,059	1455%	173%
2041	28,945	604,767	2089%	185%	37,294	577,190	1548%	174%
2042	21,533	474,640	2204%	186%	27,744	452,997	1633%	174%
2043	15,782	366,597	2323%	187%	20,334	349,880	1721%	175%
2044	11,367	275,339	2422%	187%	14,646	262,784	1794%	175%
2045	8,054	198,948	2470%	188%	10,377	189,876	1830%	176%
2046	5,617	139,683	2487%	188%	7,237	133,314	1842%	176%
2047	3,858	97,407	2525%	188%	4,971	92,965	1870%	176%
2048	2,596	68,156	2626%	188%	3,344	65,048	1945%	176%
2049	1,711	46,734	2731%	188%	2,205	44,603	2023%	176%
2050	1,109	30,256	2727%	189%	1,429	28,877	2020%	176%
2051	706	18,694	2650%	189%	909	17,842	1963%	176%
2052	439	11,266	2568%	189%	565	10,752	1902%	176%
2053	266	6,592	2476%	189%	343	6,291	1834%	176%
2054	157	3,739	2378%	189%	203	3,568	1761%	176%
2055	90	2,063	2291%	189%	116	1,969	1697%	177%
2056	50	1,106	2220%	189%	64	1,056	1645%	177%
2057	27	574	2158%	189%	34	548	1598%	177%
2058	14	287	2100%	189%	18	274	1556%	177%
2059	7	138	2031%	189%	9	132	1505%	177%
2060	3	62	1896%	189%	4	59	1404%	177%
2061	2	25	1674%	189%	2	24	1240%	177%
2062	1	9	1444%	189%	1	9	1070%	177%
2063	0	3	1217%	189%	0	3	901%	177%
2064	0	1	996%	189%	0	1	738%	177%
2065	0	0	782%	189%	0	0	579%	177%
2066	0	0	578%	189%	0	0	428%	177%
2067	0	0	385%	189%	0	0	285%	177%
2068	0	0	196%	189%	0	0	145%	177%
2069	0	0	30%	189%	0	0	22%	177%
2070	0	0	0%	189%	0	0	0%	177%
2071	0	-	0%	189%	0	-	0%	177%
2072	0	-	0%	189%	0	-	0%	177%
2073	0	-	0%	189%	0	-	0%	177%
2074	0	-	0%	189%	0	-	0%	177%
2075	-	-	0%	189%	-	-	0%	177%
2076	-	-	0%	189%	-	-	0%	177%
2077	-	-	0%	189%	-	-	0%	177%
2078	-	-	0%	189%	-	-	0%	177%
2079	-	-	0%	189%	-	-	0%	177%
Total Projected	8,887,736	51,716,992	582%	582%	11,155,615	49,839,034	447%	447%
Total Lifetime	48,661,368	91,771,538	189%	189%	50,929,247	89,893,580	177%	177%
Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates								
Past	74,221,829	54,131,387	73%	73%	74,221,829	54,131,387	73%	73%
Future	7,069,343	36,685,491	519%	519%	8,820,404	35,460,670	402%	402%
Lifetime	81,291,172	90,816,878	112%	112%	83,042,234	89,592,056	108%	108%

Exhibit 1c
Continental Casualty Company
Preferred Advantage - Policy Forms with Lifetime Benefits & without Standard Inflation
State Specific Information
Pennsylvania

12) Average Annualized Premium as of 12/31/2020

	Nationwide
Without Increase	\$2,467
With Increase	\$3,331

Pennsylvania
\$2,856
\$3,856

13) Insured Count and Premium as of 12/31/2020

Insureds Eligible for Rate Increase

	Nationwide
Insureds Not on Claim	970
Insureds on Claim	282
Total Insureds	1,252
2020 Annualized Premium	\$3,089,084

Pennsylvania
51
4
55
\$157,101

Insureds Not Eligible for Rate Increase

	Nationwide
Non-Forfeiture Insureds Not on Claim	207
Non-Forfeiture Insureds on Claim	8
Paid-Up Limited Pay Insureds Not on Claim	0
Paid-Up Limited Pay Insureds on Claim	0
Total Non-Forfeiture and Paid-Up Insureds	215

Pennsylvania
10
1
0
0
11

18) History of Rate Adjustments

SERFF Number	Approval Date
N/A	7/10/2003
CNAB-127154621	9/2/2011
CNAB-130150831	3/23/2016
CNAB-131276497	4/3/2018
CNAB-132346264	8/22/2020

Rate Increase Approved
50.0%
25.0%*
20.0%
20.0%**
8.4%

Implemented over a two-year period (11.8%, 11.8%)
Implemented over a two-year period (9.54%, 9.54%)***

20) Satisfaction of Minimum Loss Ratio Requirements

1) Expected Lifetime Loss Ratio with Increase	108%
2) Minimum Required Loss Ratio	60%
Is 1) Greater than 2)?	Yes

Exhibit 2c
Continental Casualty Company
Preferred Advantage - Policy Forms with Lifetime Benefits & without Standard Inflation
Distribution of Inforce Insureds Eligible for Rate Increase
Pennsylvania

		Nationwide				Pennsylvania			
		Count	% of Count	Premium	% of Premium	Count	% of Count	Premium	% of Premium
Issue Year	1987	0	0%	\$0	0%	0	0%	\$0	0%
	1988	0	0%	\$0	0%	0	0%	\$0	0%
	1989	0	0%	\$0	0%	0	0%	\$0	0%
	1990	0	0%	\$0	0%	0	0%	\$0	0%
	1991	0	0%	\$0	0%	0	0%	\$0	0%
	1992	0	0%	\$0	0%	0	0%	\$0	0%
	1993	0	0%	\$0	0%	0	0%	\$0	0%
	1994	15	1%	\$41,254	1%	3	5%	\$5,523	4%
	1995	220	18%	\$503,839	16%	22	40%	\$57,797	37%
	1996	777	62%	\$1,942,322	63%	25	45%	\$77,075	49%
	1997	148	12%	\$343,675	11%	3	5%	\$10,955	7%
	1998	58	5%	\$161,953	5%	1	2%	\$3,861	2%
	1999	32	3%	\$91,019	3%	1	2%	\$1,889	1%
	2000	0	0%	\$0	0%	0	0%	\$0	0%
	2001	0	0%	\$0	0%	0	0%	\$0	0%
	2002	1	0%	\$3,110	0%	0	0%	\$0	0%
	2003	0	0%	\$0	0%	0	0%	\$0	0%
	2004	1	0%	\$1,912	0%	0	0%	\$0	0%
	2005	0	0%	\$0	0%	0	0%	\$0	0%
	2006	0	0%	\$0	0%	0	0%	\$0	0%
	2007	0	0%	\$0	0%	0	0%	\$0	0%
	2008	0	0%	\$0	0%	0	0%	\$0	0%
	2009	0	0%	\$0	0%	0	0%	\$0	0%
	2010	0	0%	\$0	0%	0	0%	\$0	0%
	2011	0	0%	\$0	0%	0	0%	\$0	0%
	2012	0	0%	\$0	0%	0	0%	\$0	0%
	2013	0	0%	\$0	0%	0	0%	\$0	0%
	2014	0	0%	\$0	0%	0	0%	\$0	0%
	2015	0	0%	\$0	0%	0	0%	\$0	0%
	2016	0	0%	\$0	0%	0	0%	\$0	0%
	2017	0	0%	\$0	0%	0	0%	\$0	0%
	2018	0	0%	\$0	0%	0	0%	\$0	0%
	Total	1,252	100%	\$3,089,084	100%	55	100%	\$157,101	100%
Issue Age	<35	1	0%	\$1,316	0%	0	0%	\$0	0%
	35-39	2	0%	\$2,931	0%	0	0%	\$0	0%
	40-44	21	2%	\$26,223	1%	2	4%	\$2,410	2%
	45-49	72	6%	\$105,980	3%	11	20%	\$21,891	14%
	50-54	182	15%	\$288,530	9%	7	13%	\$15,057	10%
	55-59	316	25%	\$633,563	21%	7	13%	\$13,562	9%
	60-64	374	30%	\$999,856	32%	19	35%	\$65,129	41%
	65-69	236	19%	\$813,339	26%	8	15%	\$29,494	19%
	70-74	47	4%	\$208,412	7%	1	2%	\$9,557	6%
	75-79	1	0%	\$8,935	0%	0	0%	\$0	0%
	80+	0	0%	\$0	0%	0	0%	\$0	0%
	Total	1,252	100%	\$3,089,084	100%	55	100%	\$157,101	100%
Attained Age	<45	0	0%	\$0	0%	0	0%	\$0	0%
	45-49	0	0%	\$0	0%	0	0%	\$0	0%
	50-54	0	0%	\$0	0%	0	0%	\$0	0%
	55-59	1	0%	\$1,316	0%	0	0%	\$0	0%
	60-64	6	0%	\$9,948	0%	0	0%	\$0	0%
	65-69	22	2%	\$26,807	1%	2	4%	\$2,410	2%
	70-74	94	8%	\$145,686	5%	12	22%	\$25,681	16%
	75-79	219	17%	\$351,778	11%	7	13%	\$13,156	8%
	80-84	327	26%	\$714,546	23%	9	16%	\$22,044	14%
	85-89	370	30%	\$1,040,157	34%	17	31%	\$58,468	37%
	90+	213	17%	\$798,847	26%	8	15%	\$35,341	22%
	Total	1,252	100%	\$3,089,084	100%	55	100%	\$157,101	100%
Gender	Male	434	35%	\$1,063,620	34%	18	33%	\$44,770	28%
	Female	818	65%	\$2,025,464	66%	37	67%	\$112,331	72%
	Total	1,252	100%	\$3,089,084	100%	55	100%	\$157,101	100%
Inflation Type	None	1,252	100%	\$3,089,084	100%	55	100%	\$157,101	100%
	Simple	0	0%	\$0	0%	0	0%	\$0	0%
	Compound	0	0%	\$0	0%	0	0%	\$0	0%
	Total	1,252	100%	\$3,089,084	100%	55	100%	\$157,101	100%
Tax Status	TQ	0	0%	\$0	0%	0	0%	\$0	0%
	NTQ	1,252	100%	\$3,089,084	100%	55	100%	\$157,101	100%
	Total	1,252	100%	\$3,089,084	100%	55	100%	\$157,101	100%
Max Benefit	Lifetime	1,252	100%	\$3,089,084	100%	55	100%	\$157,101	100%
	Not Lifetime	0	0%	\$0	0%	0	0%	\$0	0%
	Total	1,252	100%	\$3,089,084	100%	55	100%	\$157,101	100%
Cov Type	Facility Only	85	7%	\$153,580	5%	3	5%	\$3,003	2%
	Comprehensive	1,167	93%	\$2,935,504	95%	52	95%	\$154,098	98%
	Total	1,252	100%	\$3,089,084	100%	55	100%	\$157,101	100%

Exhibit 3c
Continental Casualty Company
Preferred Advantage - Policy Forms with Lifetime Benefits & without Standard Inflation
Nationwide Historical and Projected Experience Restated with Approved Pennsylvania Rate Increases

Year	Without Rate Increase				With 35% Cumulative Rate Increase			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1988	-	-	0%	0%	-	-	0%	0%
1989	-	-	0%	0%	-	-	0%	0%
1990	-	-	0%	0%	-	-	0%	0%
1991	-	-	0%	0%	-	-	0%	0%
1992	-	-	0%	0%	-	-	0%	0%
1993	-	-	0%	0%	-	-	0%	0%
1994	17,949	-	0%	0%	17,949	-	0%	0%
1995	1,032,814	493,845	48%	47%	1,032,814	493,845	48%	47%
1996	4,028,053	376,908	9%	17%	4,028,053	376,908	9%	17%
1997	7,573,734	1,796,407	24%	21%	7,573,734	1,796,407	24%	21%
1998	8,145,831	2,869,025	35%	27%	8,145,831	2,869,025	35%	27%
1999	7,978,612	3,351,693	42%	31%	7,978,612	3,351,693	42%	31%
2000	7,692,522	4,820,451	63%	38%	7,692,522	4,820,451	63%	38%
2001	7,357,818	5,030,873	68%	43%	7,357,818	5,030,873	68%	43%
2002	7,107,917	6,819,144	96%	50%	7,107,917	6,819,144	96%	50%
2003	6,770,467	6,364,574	94%	55%	6,770,467	6,364,574	94%	55%
2004	9,446,391	5,263,590	56%	55%	9,446,391	5,263,590	56%	55%
2005	8,879,587	6,176,234	70%	57%	8,879,587	6,176,234	70%	57%
2006	8,100,374	5,714,307	71%	58%	8,100,374	5,714,307	71%	58%
2007	7,774,623	6,094,029	78%	60%	7,774,623	6,094,029	78%	60%
2008	7,282,599	9,693,067	133%	65%	7,282,599	9,693,067	133%	65%
2009	6,902,864	10,780,475	156%	71%	6,902,864	10,780,475	156%	71%
2010	6,345,839	8,652,796	136%	75%	6,345,839	8,652,796	136%	75%
2011	5,924,144	10,480,048	177%	80%	5,924,144	10,480,048	177%	80%
2012	6,011,778	10,572,043	176%	85%	6,011,778	10,572,043	176%	85%
2013	5,987,929	7,585,583	127%	87%	5,987,929	7,585,583	127%	87%
2014	5,524,041	12,936,539	234%	93%	5,524,041	12,936,539	234%	93%
2015	5,007,123	6,869,037	137%	94%	5,007,123	6,869,037	137%	94%
2016	4,844,551	9,583,515	198%	98%	4,844,551	9,583,515	198%	98%
2017	5,007,556	8,536,691	170%	100%	5,007,556	8,536,691	170%	100%
2018	4,460,156	7,859,766	176%	102%	4,460,156	7,859,766	176%	102%
2019	3,743,769	9,035,648	241%	106%	3,743,769	9,035,648	241%	106%
2020	3,467,489	10,958,232	316%	110%	3,467,489	10,958,232	316%	110%
Total Actual	162,416,532	178,714,520	110%	110%	162,416,532	178,714,520	110%	110%
Projected								
2021	3,593,089	10,309,848	287%	114%	3,809,543	10,215,822	268%	114%
2022	3,154,519	10,657,918	338%	118%	3,977,951	10,731,543	270%	117%
2023	2,735,195	9,088,624	332%	121%	3,524,135	9,107,892	258%	120%
2024	2,353,850	8,435,161	358%	125%	3,032,795	8,050,518	265%	123%
2025	2,009,016	7,733,868	385%	128%	2,588,497	7,381,204	285%	125%
2026	1,700,138	7,048,778	415%	130%	2,190,526	6,727,353	307%	127%
2027	1,426,050	6,388,776	448%	133%	1,837,379	6,097,448	332%	129%
2028	1,185,079	5,738,919	484%	135%	1,526,903	5,477,224	359%	131%
2029	975,705	5,091,319	522%	137%	1,257,138	4,859,155	387%	133%
2030	797,640	4,471,487	561%	139%	1,027,711	4,267,587	415%	134%
2031	646,351	3,899,718	601%	141%	835,361	3,721,891	446%	136%
2032	524,055	3,362,680	642%	142%	675,214	3,209,341	475%	137%
2033	421,293	2,884,587	685%	143%	542,811	2,753,050	507%	138%
2034	336,728	2,449,779	728%	144%	433,853	2,338,069	539%	139%
2035	267,581	2,054,397	768%	145%	344,762	1,960,717	569%	140%
2036	211,376	1,706,525	807%	146%	272,346	1,628,707	598%	140%
2037	165,973	1,402,925	845%	147%	213,846	1,338,951	626%	141%
2038	129,531	1,138,386	879%	147%	166,893	1,086,475	651%	141%
2039	100,401	911,619	908%	148%	129,361	870,049	673%	142%
2040	77,321	718,121	929%	148%	99,624	685,375	688%	142%
2041	59,174	559,563	946%	148%	76,242	534,046	700%	142%
2042	44,968	432,460	962%	148%	57,939	412,740	712%	142%
2043	33,919	329,494	971%	149%	43,703	314,469	720%	143%
2044	25,397	247,577	975%	149%	32,722	236,288	722%	143%
2045	18,884	182,826	968%	149%	24,331	174,490	717%	143%
2046	13,932	133,754	960%	149%	17,951	127,654	711%	143%
2047	10,186	97,126	954%	149%	13,124	92,697	706%	143%
2048	7,388	69,568	942%	149%	9,519	66,396	697%	143%
2049	5,322	49,064	922%	149%	6,857	46,827	683%	143%
2050	3,803	34,455	906%	149%	4,900	32,884	671%	143%
2051	2,697	24,114	894%	149%	3,475	23,014	662%	143%
2052	1,892	16,793	888%	149%	2,437	16,028	658%	143%
2053	1,319	11,582	878%	149%	1,699	11,054	651%	143%
2054	915	7,823	855%	149%	1,179	7,467	633%	143%
2055	631	5,332	845%	149%	813	5,089	626%	143%
2056	430	3,650	849%	149%	554	3,484	629%	143%
2057	290	2,470	853%	149%	373	2,358	632%	143%
2058	191	1,636	855%	149%	246	1,561	634%	143%
2059	123	1,033	839%	149%	159	986	622%	143%
2060	78	611	788%	149%	100	583	584%	143%
2061	48	353	738%	149%	62	337	547%	143%
2062	29	199	689%	149%	37	190	511%	143%
2063	17	109	640%	149%	22	104	474%	143%
2064	10	58	591%	149%	13	55	438%	143%
2065	5	30	551%	149%	7	29	408%	143%
2066	3	15	515%	149%	4	14	381%	143%
2067	1	7	480%	149%	2	7	356%	143%
2068	1	3	443%	149%	1	3	328%	143%
2069	0	1	400%	149%	0	1	296%	143%
2070	0	1	344%	149%	0	1	255%	143%
2071	0	0	289%	149%	0	0	214%	143%
2072	0	0	239%	149%	0	0	177%	143%
2073	0	0	193%	149%	0	0	143%	143%
2074	0	0	149%	149%	0	0	111%	143%
2075	0	0	113%	149%	0	0	84%	143%
2076	0	0	79%	149%	0	0	58%	143%
2077	0	0	26%	149%	0	0	20%	143%
2078	0	0	0%	149%	0	0	0%	143%
2079	0	0	0%	149%	0	0	0%	143%
Total Projected	23,044,546	97,705,142	424%	424%	28,785,120	94,619,226	329%	329%
Total Lifetime	185,461,079	276,419,662	149%	149%	191,201,652	273,333,746	143%	143%
Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates								
Past	310,604,434	289,405,344	93%	93%	310,604,434	289,405,344	93%	93%
Future	18,740,596	74,846,734	399%	399%	23,263,111	72,714,024	313%	313%
Lifetime	329,345,030	364,252,078	111%	111%	333,867,545	362,119,368	108%	108%

Exhibit 4c
Continental Casualty Company
Preferred Advantage - Policy Forms with Lifetime Benefits & without Standard Inflation
Pennsylvania Specific Experience and Projections

Year	Without Rate Increase				With 35% Cumulative Rate Increase			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1988	-	-	0%	0%	-	-	0%	0%
1989	-	-	0%	0%	-	-	0%	0%
1990	-	-	0%	0%	-	-	0%	0%
1991	-	-	0%	0%	-	-	0%	0%
1992	-	-	0%	0%	-	-	0%	0%
1993	-	-	0%	0%	-	-	0%	0%
1994	-	-	0%	0%	-	-	0%	0%
1995	49,387	-	0%	0%	49,387	-	0%	0%
1996	199,631	158,141	79%	64%	199,631	158,141	79%	64%
1997	332,167	122,950	37%	48%	332,167	122,950	37%	48%
1998	338,389	33,815	10%	34%	338,389	33,815	10%	34%
1999	331,949	1,281	0%	25%	331,949	1,281	0%	25%
2000	319,625	160,598	50%	30%	319,625	160,598	50%	30%
2001	314,599	196,551	62%	36%	314,599	196,551	62%	36%
2002	309,579	11,894	4%	31%	309,579	11,894	4%	31%
2003	293,672	236,168	80%	37%	293,672	236,168	80%	37%
2004	340,414	211,841	62%	40%	340,414	211,841	62%	40%
2005	327,169	242,366	74%	44%	327,169	242,366	74%	44%
2006	311,579	585,515	188%	57%	311,579	585,515	188%	57%
2007	289,931	273,148	94%	59%	289,931	273,148	94%	59%
2008	271,989	271,951	100%	62%	271,989	271,951	100%	62%
2009	249,726	527,707	211%	71%	249,726	527,707	211%	71%
2010	218,308	355,923	163%	75%	218,308	355,923	163%	75%
2011	194,092	20,132	10%	73%	194,092	20,132	10%	73%
2012	180,039	1,242,923	690%	95%	180,039	1,242,923	690%	95%
2013	177,637	245,461	138%	97%	177,637	245,461	138%	97%
2014	163,204	103,842	64%	96%	163,204	103,842	64%	96%
2015	166,338	34,225	21%	94%	166,338	34,225	21%	94%
2016	152,984	225,895	148%	95%	152,984	225,895	148%	95%
2017	161,403	62,486	39%	94%	161,403	62,486	39%	94%
2018	160,077	95,915	60%	93%	160,077	95,915	60%	93%
2019	157,174	147,285	94%	93%	157,174	147,285	94%	93%
2020	153,678	238,174	155%	94%	153,678	238,174	155%	94%
Total Actual	6,164,740	5,806,190	94%	94%	6,164,740	5,806,190	94%	94%
Projected								
2021	155,174	471,904	304%	99%	164,522	467,600	284%	99%
2022	137,181	467,317	341%	104%	172,990	470,545	272%	104%
2023	119,803	386,638	323%	108%	154,359	387,457	251%	107%
2024	104,073	349,584	336%	112%	134,091	333,643	249%	110%
2025	89,848	312,057	347%	115%	115,764	297,828	257%	112%
2026	77,088	279,189	362%	118%	99,323	266,458	268%	115%
2027	65,898	251,947	382%	120%	84,906	240,458	283%	117%
2028	56,086	230,062	410%	123%	72,264	219,571	304%	119%
2029	47,564	210,315	442%	125%	61,284	200,725	328%	120%
2030	40,298	193,091	479%	127%	51,922	184,286	355%	122%
2031	34,100	177,515	521%	129%	43,936	169,420	386%	124%
2032	28,783	162,475	564%	131%	37,086	155,066	418%	125%
2033	24,222	149,957	619%	132%	31,209	143,119	459%	126%
2034	20,278	136,094	671%	134%	26,127	129,888	497%	128%
2035	16,870	122,082	724%	135%	21,737	116,515	536%	129%
2036	13,930	108,252	777%	136%	17,949	103,316	576%	130%
2037	11,386	93,971	825%	137%	14,671	89,686	611%	131%
2038	9,201	80,302	873%	138%	11,854	76,640	647%	132%
2039	7,352	66,444	904%	139%	9,473	63,414	669%	132%
2040	5,808	53,675	924%	140%	7,483	51,228	685%	133%
2041	4,524	42,724	944%	140%	5,828	40,776	700%	133%
2042	3,472	32,745	943%	141%	4,473	31,251	699%	134%
2043	2,617	24,418	933%	141%	3,372	23,304	691%	134%
2044	1,945	17,792	915%	141%	2,506	16,981	678%	134%
2045	1,423	12,572	883%	141%	1,834	11,999	654%	134%
2046	1,017	8,619	848%	141%	1,310	8,226	628%	134%
2047	714	5,672	795%	142%	919	5,413	589%	134%
2048	491	3,585	730%	142%	633	3,422	541%	135%
2049	329	2,219	674%	142%	424	2,118	499%	135%
2050	215	1,320	615%	142%	277	1,260	455%	135%
2051	136	738	542%	142%	175	704	401%	135%
2052	83	399	478%	142%	108	381	354%	135%
2053	49	211	427%	142%	64	201	316%	135%
2054	28	108	386%	142%	36	103	286%	135%
2055	15	54	354%	142%	20	51	262%	135%
2056	8	26	330%	142%	10	25	245%	135%
2057	4	12	312%	142%	5	12	231%	135%
2058	2	6	295%	142%	2	5	219%	135%
2059	1	2	279%	142%	1	2	207%	135%
2060	0	1	267%	142%	0	1	198%	135%
2061	0	0	251%	142%	0	0	186%	135%
2062	0	0	234%	142%	0	0	173%	135%
2063	0	0	218%	142%	0	0	162%	135%
2064	0	0	201%	142%	0	0	149%	135%
2065	0	0	178%	142%	0	0	132%	135%
2066	0	0	155%	142%	0	0	115%	135%
2067	0	0	51%	142%	0	0	38%	135%
2068	0	0	29%	142%	0	0	22%	135%
2069	0	0	1%	142%	0	0	1%	135%
2070	0	0	0%	142%	0	0	0%	135%
2071	0	0	0%	142%	0	0	0%	135%
2072	0	-	0%	142%	0	-	0%	135%
2073	0	-	0%	142%	0	-	0%	135%
2074	0	-	0%	142%	0	-	0%	135%
2075	0	-	0%	142%	0	-	0%	135%
2076	-	-	0%	142%	-	-	0%	135%
2077	-	-	0%	142%	-	-	0%	135%
2078	-	-	0%	142%	-	-	0%	135%
2079	-	-	0%	142%	-	-	0%	135%
Total Projected	1,082,019	4,456,094	412%	412%	1,354,946	4,313,099	318%	318%
Total Lifetime	7,246,759	10,262,283	142%	142%	7,519,687	10,119,289	135%	135%
Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates								
Past	12,112,842	9,951,543	82%	82%	12,112,842	9,951,543	82%	82%
Future	861,720	3,328,780	386%	386%	1,072,115	3,233,326	302%	302%
Lifetime	12,974,562	13,280,323	102%	102%	13,184,957	13,184,869	100%	100%



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February 23, 2022

Honorable Jessica K. Altman
Commissioner
Pennsylvania Insurance Department
1326 Strawberry Square
Harrisburg, Pennsylvania 17120

Re: Continental Casualty Company
(NAIC #218-20443, FEIN #36-2114545)
SERFF Tracking #CNAB-133114868 (Form Filing)
SERFF Tracking #CNAB-133114869 (Rate Filing)
Endorsement & Rate Increase Filings for Individual Long Term Care Policy Forms:

Product Portfolio	Issue Date Range	Policy Form
Preferred Advantage	1994 to 2004	P1-21295-A37/-A87
		P1-21300-A37/-A87
		P1-21305-A37/-A87
TQ	1997 to 2003	P1-N0022-A37/-A87/-B37/-B87
		P1-N0023-A37/-A87/-B37
		P1-N0026-A37/-A87/-B37/-B87
		P1-N0027-A37/-A87/-B37
		P1-N0030-A37/-A87
		P1-N0031-A37/-A87
		P1-N0034-A37/-A87

Dear Commissioner Altman:

Enclosed is a request for a pre-rate stability premium rate increase that applies to Pennsylvania policies issued before 9/16/2002 for the above captioned long term care policy forms, including all associated riders, issued prior to your state's implementation of rate stability requirements. This increase is requested in order to establish premium rates that are reasonable in relation to benefits based on actual historical experience and best-estimate projections for these forms. The method that we used to determine the requested premium rate increase is outlined in the enclosed actuarial memorandum and supporting exhibits.

The rate increase indication varies by product portfolio, benefit period, and automatic increase benefit (AIB) rider, with rate increases as follows:

Preferred Advantage	Policies with AIB Rider	Policies without AIB Rider
Unlimited Lifetime Max Benefits	60.0%	35.0%
Non-Lifetime Max Benefits	35.0%	0.0%

TQ	Policies with AIB Rider	Policies without AIB Rider
Unlimited Lifetime Max Benefits	60.0%	35.0%
Non-Lifetime Max Benefits	35.0%	0.0%

Please see the Supplement to Rate Sheet for details on the implementation schedule.

Although a greater increase can be justified, the Company is limiting the rate request at this time. The rate increase request varies by product in order to be sensitive to the age distribution of the policies within each product portfolio.

The proposed premium rates will be effective on the insured's next policy anniversary date following a notification period at least as long as required by your state following approval. No insured will receive more than one rate increase in a 12-month period.

Upon approval of this rate revision, CCC will communicate to insureds their options to reduce the impact of the rate increase. These options may include increasing the elimination period, reducing the lifetime maximum, reducing the daily benefit or eliminating optional riders, such as automatic increase riders. Available options will depend upon the insured's current coverage levels, benefit options available under their specific policy form, and any statutory minimum benefit levels in your state.

In addition, the Company is making a number of alternative options available for all insureds in conjunction with this rate increase. The first option provides an Increased Contingent Non-Forfeiture ("ICNF") benefit upon lapse to all insureds regardless of their original issue date, rate increase amount or issue age of the insured. If this benefit is elected by the insured, the insured will not have to pay prospective premium, and their remaining benefit pool amount will equate to 150% of lifetime premiums paid. If a policy lapses due to non-payment of premiums without notifying the Company of their intention to elect the ICNF option, the insured's coverage will default to a standard 100% of lifetime premiums paid contingent non-forfeiture benefit.

The second option that is being offered to insureds is the "Surrender Option". If this option is elected by the insured, the insured will surrender their policy in return for a one-time cash payment from the Company. The amount of the one-time cash surrender payment is equal to the unisex-adjusted statutory active life reserve held for the specific insured.

Both of the above alternative options will be offered to all insureds in your state, regardless of whether or not they receive a rate increase, in order to ensure fairness within these product portfolios. If a policy lapses due to non-

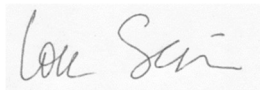
payment of premiums without notifying the Company of the insured's intention to elect any of the above options, the insured's coverage will default to a standard 100% CNF benefit.

For states that do not approve the full requested increase, the Company anticipates that additional rate increase filings will be necessary in the near future. The exact timing of when an additional filing will be made and the amount that will be requested will be determined by the attributes of these policy forms, the Company's experience, and applicable laws and regulations.

Included with this request are the following items:

- this cover letter;
- an actuarial memorandum including supporting exhibits;
- a rate supplement page reflecting the rate increase request; and
- a surrender option endorsement.

We respectfully request your favorable consideration and approval of this filing.

A handwritten signature in cursive script, appearing to read "Lou Scarim", is displayed within a light gray rectangular box.

Louis Scarim, ASA, MAAA
Actuarial Consulting Director, LTC Inforce Management
(312) 822-6179
louis.scarim@cna.com

Continental Casualty Company (“CCC”)
Actuarial Memorandum
In Support of a Premium Rate Increase Request
Pennsylvania

The following individual long term care policy forms subject to this rate increase request were originally issued nationwide from 1994 to 2004:

Product Portfolio	Issue Date Range	Policy Form
Preferred Advantage	1994 to 2004	P1-21295-A37/-A87
		P1-21300-A37/-A87
		P1-21305-A37/-A87
TQ	1997 to 2003	P1-N0022-A37/-A87/-B37/-B87
		P1-N0023-A37/-A87/-B37
		P1-N0026-A37/-A87/-B37/-B87
		P1-N0027-A37/-A87/-B37
		P1-N0030-A37/-A87
		P1-N0031-A37/-A87
		P1-N0034-A37/-A87

1. Purpose and Justification of Filing

The purpose of this memorandum is to provide actuarial information supporting CCC’s request for a rate increase for the above-listed policy forms. The rate increase request varies by benefit period and automatic increase benefit (AIB) rider as follows:

Preferred Advantage	Policies with AIB Rider	Policies without AIB Rider
Unlimited Lifetime Max Benefits	60.0%	35.0%
Non-Lifetime Max Benefits	35.0%	0.0%

TQ	Policies with AIB Rider	Policies without AIB Rider
Unlimited Lifetime Max Benefits	60.0%	35.0%
Non-Lifetime Max Benefits	35.0%	0.0%

Please see the Supplement to Rate Sheet for details on the implementation schedule.

This rate increase is requested in order to establish premium rates that are reasonable in relation to benefits based on actual historical experience and best-estimate projections for these forms. This rate filing is not intended to be used for other purposes.

Upon approval of this rate revision, CCC will communicate to insureds their options to reduce the impact of the rate increase. These options may include increasing the elimination period, reducing the lifetime maximum, reducing the daily benefit or eliminating optional riders.

Because the requested rate increase applies to policies with an AIB rider, insureds with an AIB rider who choose to drop it (i.e. Freeze and Drop) will:

- Not be subject to the AIB rate increase;
- Retain their inflated benefits as of the effective date of the coverage change; and
- Be charged an original issue age premium based on the original non-inflated benefits.

Available options will depend upon the insured's current coverage levels, benefit options available under their specific policy form, and any statutory minimum benefit levels in your state.

In addition, the Company is making a number of alternative options available for all insureds in conjunction with this rate increase. The first option provides an Increased Contingent Non-Forfeiture ("ICNF") benefit upon lapse. If this benefit is elected by the insured, the insured will not have to pay prospective premium, and their remaining benefit pool amount will equate to 150% of lifetime premiums paid, capped at current remaining lifetime benefits.

The second option that is being offered to insureds is the "Surrender Option". If this option is elected by the insured, the insured will surrender their policy in return for a one-time cash payment from the Company. The amount of the one-time cash surrender payment is equal to the unisex-adjusted statutory active life reserve held for the specific insured.

Both of the above alternative options will be offered to all insureds in your state (those with and without AIB riders), regardless of whether or not they receive a rate increase, in order to ensure fairness within the product portfolio. If a policy lapses due to non-payment of premiums without notifying the Company of the insured's intention to elect any of the above options, the insured's coverage will default to a standard 100% CNF benefit.

Please note:

- The requested rate increase amount is less than the amount CCC can justify; and
- CCC will continue to monitor the experience of this block and will react accordingly to experience development.

2. Description of Benefits

All of the forms are guaranteed renewable individual long term care policies sold through non-captive agents. Additional details for each product portfolio are shown below:

Preferred Advantage (P1-21295-Series, P1-21300-Series, P1-21305-Series, P1-21925-Series, P1-22435-Series, P1-22436-Series)

- P1-21295-Series provides for long term care and home health care benefits. Benefits are limited to the policy's lifetime maximum which is equal to the following multipliers times the daily benefit amount: 730x, 1,095x, 1,460x, 1,825x, or unlimited. Benefit eligibility requires either medical necessity or due to the inability to perform two or more activities of daily living or due to cognitive impairment.
- *Long term Care Benefits:* For each day of stay in a facility, this policy pays the expenses incurred by the facility up to the maximum daily facility benefit (as shown on insured's schedule) limited to the lifetime maximum. The policy includes a bed reservation benefit limited to 21 days per calendar year. The lifetime maximum is equal to either unlimited or the following multipliers times the daily benefit amount: 730x, 1,095x, 1,460x, and 1,825x.

Home Health Care Benefits: This policy pays 100% of the expenses incurred each day for therapist or nurse, 80% of the expenses incurred for home health aide, medical social worker or homemaker and 80% of expenses incurred each day of care for adult day care. The total benefits payable each day for home health care benefits is limited to the daily home and community based care benefit amount shown on the insured's schedule (either 100% or 50% of the long term care daily benefit amount, selected at issue).

- This policy also provides for a waiver of premium benefit, caregiver training benefit, medical help benefit, alternate care facility benefit and respite care benefit.
- *Optional benefits:* Automatic increase riders.
- Policy P1-22435-Series is identical to P1-21295 except that it provides a non-forfeiture benefit.
- P1-21300-Series is similar to P1-21295-Series except that it pays 100% of expenses incurred each day for home health aide, medical social worker or homemaker or adult day care. P1-22436-Series is identical to P1-21300 except that it provides a non-forfeiture benefit.
- P1-21305-Series is similar to the above policies except that it provides facility only coverage. Policy P1-21925-Series is identical to P1-21305 except that it provides a non-forfeiture benefit.

TQ (P1-N0022-Series, P1-N0023-Series, P1-N0026-Series, P1-N0027-Series, P1-N0030-Series, P1-N0031-Series, P1-N0034-Series, P1-N0035-Series, P1-N0066-Series, P1-N0070-Series)

- The forms in the "TQ" policy portfolio are intended to meet the requirements of the federal tax code for favorable income tax treatment of long term care insurance.

- *Long term Care Benefits:* For all forms, for each day of stay in a facility, this policy pays the expenses incurred by the facility up to the maximum daily facility benefit (as shown on insured's schedule) limited to the lifetime maximum. The policy includes a bed reservation benefit limited to 21 days per calendar year. The lifetime maximum is equal to either unlimited or the following multipliers times the daily benefit amount: 730x, 1,095x, 1,460x, and 1,825x.
- *Home Health Care Benefits:* Form P1-N0022-Series pays 100% of the expenses incurred each day for therapist or nurse, 80% of the expenses incurred for home health aide, medical social worker or homemaker and 80% of expenses incurred each day of care for adult day care. The total benefits payable each day for home health care benefits is limited to the daily home and community based care benefit amount shown on the insured's schedule (either 100% or 50% of the long term care daily benefit amount, selected at issue).
- This policy also provides for a waiver of premium benefit, caregiver training benefit, medical help benefit, alternate care facility benefit and respite care benefit.
- Optional benefits: Automatic increase riders.
- Policy P1-N0023-Series is identical to P1-N0022 except that it provides a non-forfeiture benefit.
- P1-N0026-Series is similar to P1-N0022-Series except that it pays 100% of expenses incurred each day for home health aide, medical social worker or homemaker or adult day care.
- P1-N0027-Series is identical to P1-N0026 except that it provides a non-forfeiture benefit.
- P1-N0030-Series is similar to the above policies except that it is for nursing home only benefits and does not include any home health care benefits. Policy P1-N0031-Series is identical to P1-N0030 except that it provides a non-forfeiture benefit.
- P1-N0034-Series and P1-N0035-Series are tax qualified versions of forms P1-18876-Series and P1-18878-Series.
- P1-N0066-Series is comparable to P1-N0022-Series. P1-N0070-Series is comparable to P1-N0030.

3. Renewability

These forms provide the insured guaranteed renewable individual long term care coverage.

4. Applicability of Rate Increase

This filing applies to in-force insureds only, as these forms are no longer being marketed. This filing is a request for a pre-rate stability premium rate increase that applies to Pennsylvania policies issued before 9/16/2002, and will apply to the base forms and all riders associated with the base forms for policies.

5. Experience Study and Actuarial Assumptions

This section provides a summary of the results of the annual experience study, along with the resulting assumptions utilized in the projection model. The liability assumptions below are consistent with the assumptions being used in the Company's reserve adequacy and asset adequacy testing. It is noted that some actual to expected ("A/E") analysis tables in this section have A/E ratios other than 100%. In order to reduce year over year volatility, if A/E results from the experience study are within an internal target range, the assumption will not be revised from the prior year's assumption.

Morbidity Overview

CNA has a sizeable block of LTC policies with a robust and credible amount of claims experience. As such, the 2020 morbidity study used experience from 2009 to 2019 to develop frequency and severity (claim utilization, disabled life mortality, and claim recovery) assumptions. CNA assesses morbidity experience separately for the Individual Long-Term Care (ILTC), State Farm (SF), and Group Long-Term Care (GLTC) blocks of business. Furthermore, any variation in assumption by different policyholder characteristics (i.e. gender) is based on company experience where meaningful variation has existed and is expected to continue in the future.

Assumptions are set at a granular level to provide the best possible fit to experience. A dynamic validation is then performed to ensure that assumptions provide a reasonable fit in the aggregate. The dynamic validation was performed by modeling best-estimate assumptions with inforce liability data as of December 31, 2018 to see how well the assumptions would replicate actual historical experience.

For policyholders aged 85 and older, CNA has approximately over 350K exposure years and over 35K claims. For older attained ages with less credible data, CNA has set incidence, claim recovery and utilization assumptions using age bands where assumptions do not vary beyond a certain age threshold. Disabled life mortality varies by attained age and is based on a 2012 IAM mortality table for attained ages 0 to 100 and based on the maximum of 2000 Annuity and 2012 IAM for attained ages 100 and older. Impairment factors by attained age are applied to this table to account for the higher mortality rates associated with disabled lives compared to healthy lives.

Morbidity experience can vary from carrier to carrier based on policy language, claim adjudication practices and rate increase programs undertaken. None of these differences are captured in industry studies. Given the fact that CNA has credible and robust claims experience, assumptions were set entirely based on company experience and were not directly compared to industry data.

The ILTC block is past its peak number of claims so the number of new incurred claims has been slowing. GLTC is a younger block and the number of new incurred claims is expected to continue to increase over the next twenty to thirty years. Also, within the study period mentioned above, CNA has implemented ILTC and GLTC rate increases on both ILTC and GLTC, which has temporarily increased incidence due to anti-selection.

The amount of new incurred claim dollars has increased over the recent past due to increases in the cost of care. Incurred claim dollars are expected to continue to increase for both ILTC and GLTC over the near to mid-term.

CNA has granular assumptions which allows for variation in lapse rates. One variation that is worth noting is the assumption that lapse rates are expected to be lower for policies with richer benefits (i.e. policies with longer benefit periods and with contractual inflation). Therefore, as the block ages, there is an expectation that the policies that persist will naturally have longer lengths of stay with higher severity as the mix shift changes over time. Also assumed in the claim utilization assumption is an expectation of rising cost of care inflation which will also lead to higher severity of claims over time.

Claim Incidence

The frequency of claim is the probability that a healthy insured will go into disabled status, also known as 'claim incidence'. The final incidence rate that gets modeled is comprised of a base incidence table, adjustment factors based on policy features and demographics, and adjustments for policyholder behavior to rate actions.

Base Incidence Actual to Expected Analysis

The below table summarizes the results of the experience study for ILTC base incidence rates, which includes experience over the past ten years. These tables show policy experience prior to any rate increases in order to avoid distortion caused by temporary anti-selection, which is layered on separately. This explains the shrinking exposure years over time. Something of note is the Individual Long-Term Care block has undergone significant rate action initiatives over the recent past, causing limited credibility that may not be representative of nationwide experience. This experience was factored into the assumption setting process but weighted according to the exposures shown below:

Best-Estimate Incidence A/E Results Individual Long Term Care						
Calendar Year	Exposures (Years)	Actual Claims	Expected Claims	Actual Incidence Rate	Expected Incidence Rate	Actual / Expected
2010	243,073	5,206	5,503	2.14%	2.26%	95%
2011	233,060	5,325	5,750	2.28%	2.47%	93%
2012	222,734	5,666	6,075	2.54%	2.73%	93%
2013	212,130	6,017	6,196	2.84%	2.92%	97%

2014	200,678	6,395	6,343	3.19%	3.16%	101%
2015	189,684	6,923	6,396	3.65%	3.37%	108%
2016	178,602	6,590	6,395	3.69%	3.58%	103%
2017	168,277	6,858	6,509	4.08%	3.87%	105%
2018	158,506	6,735	6,480	4.25%	4.09%	104%
2019	150,028	6,522	6,617	4.35%	4.41%	99%
Total	1,956,772	62,237	62,264	3.18%	3.18%	100%

Base Incidence Assumption

The base incidence rates are single-dimensional tables that vary by attained age. These base incidence tables vary by the following:

- Whether the policy covers comprehensive or facility only benefits
- The situs of the claim (Nursing Home, Home Health Care, Assisted Living Facility)
- Gender

A sample table is shown below:

Plan Type: Comprehensive

Situs: Assisted Living Facility

Gender: Male

Attained Age	Annual Incidence Rate (%)
44 and Prior	0.0009%
45	0.0011%
46	0.0013%
47	0.0015%
...	...
55	0.0057%
56	0.0067%
57	0.0079%
...	...
65	0.0295%
66	0.0348%
67	0.0410%
...	...
75	0.1655%
76	0.1976%
77	0.2358%
...	...
85	0.9667%
86	1.1525%

87	1.3738%%
88	0.9633%
89	1.6593%
90	1.8232%
91	1.4466%
92	2.1559%
...	...
95	2.7720%
96 to 120	3.0142%

Incidence Rate Adjustment Factors

There are a number of incidence rate adjustment factors that are applied to adjust the base incidence tables for various policy features. The annual experience study reviews these adjustment factors and provides updates as needed. The incidence adjustment factors are shown below:

Category	Variable/Benefit Feature	Adjustment Factor
Underwriting Class	Preferred	1.0000
	Standard	1.3082
	Substandard	1.3622
Elimination Period	0 Days	1.0000
	1-89 Days	0.8068
	90+ Days	0.8068
Benefit Period	Lifetime	1.2418
	Non-Lifetime	1.0000
Tax Status	Tax Qualified	0.8366
	Non-Tax Qualified	1.0000

Temporary Anti-Selection Overview

As part of the company's annual experience study, the relationship between premium rate actions and incidence rates were developed into an assumption set. At any time, there is a subset of policyholders that already qualify for their long term care benefits, but have not utilized the policy. When a rate increase notification is received, some of these policyholders will go on claim to avoid paying the increased premium, since their premium rates will be waived. This phenomenon is known as anti-selection or 'shock morbidity'. We are using a durational impact of 1 year and severity of 10% for ILTC. ***Future Incidence Improvement (i.e. Morbidity Improvement)***

No future incidence improvement is assumed.

Model Calibration

The morbidity assumptions are intended to reflect the best-estimate of the long term. Long-Term Care policies are complex and have multiple decrements. Assumptions are developed independently and when combined in the model, they do not always produce results that seem reasonable. Model calibration is performed when necessary to fit the model to the long term view.

A dynamic validation was performed by modeling our best-estimate assumptions with inforce liability data as of December 31, 2018 to see how well the assumptions would replicate actual historical experience in the near term. This analysis was performed separately for ILTC and GLTC. Based on how well the model ‘fits’ actual claims experience, additional incidence calibration factors may be applied. A temporary ILTC calibration factor of 1.05 starting in 2019 and linearly grading down to 1.00 by 2025 was selected to recalibrate experience such that the model fits better in the near term.

Calendar Year	Calibration Factors
2018	1.0583
2019	1.0500
2020	1.0417
2021	1.0333
2022	1.0250
2023	1.0167
2024	1.0083
2025+	1.0000

Claim Severity

In the projection system, the severity of claim is the associated length and cost of a claim once an insured becomes disabled (or is already disabled). The severity of a claim is driven by three key assumptions:

- Claim Recovery
- Benefit Utilization
- Disabled Life Mortality

A further breakdown of these three components is described below.

Recovery Overview

Once a policyholder is on claim, there is an associated probability that the policyholder will recover back in to a ‘healthy’ status prior to death or exhausting benefits. This is the recovery rate assumption in the projection model.

Recovery Actual to Expected Analysis

The below table summarizes the results of the experience study for ILTC recovery rates, which includes experience over the past seven years:

Best-Estimate Recovery A/E Results Individual Long Term Care									
Calendar Year	Actuals			Current Claims			Future Claims		
	Exposures (Years)	Actual Recoveries	Actual Recovery Rate	Expected Recoveries	Expected Recovery Rate	Actual / Expected	Expected Recoveries	Expected Recovery Rate	Actual / Expected
2015	13,645	1,437	10.5%	1,496	11.0%	96%	1,483	10.9%	97%
2016	14,228	1,498	10.5%	1,489	10.5%	101%	1,473	10.4%	102%
2017	14,699	1,441	9.8%	1,451	9.9%	99%	1,445	9.8%	100%
2018	15,003	1,415	9.4%	1,426	9.5%	99%	1,431	9.5%	99%
2019	15,113	1,519	10.1%	1,415	9.4%	107%	1,398	9.3%	109%
Total	72,688	7,310	10.1%	7,277	10.0%	101%	7,230	9.9%	101%

Recovery Assumption

The recovery tables are two-dimensional that vary by age of disability and disability duration. The first five years of the tables contain monthly rates and are annual thereafter. The recovery tables vary by the following:

- Benefit period (lifetime vs non-lifetime)
- Gender
- Presence of a restoration of benefits rider
- The situs of the claim (Nursing Home, Home Health Care, Assisted Living Facility)
- Diagnosis of the claim (for insureds currently on claim)
- Tax-qualified status (tax-qualified, not tax-qualified)
- Eliminated period (0 day, 1-89 day, 90+ day)

Insureds that are currently in claim status have a known situs of care, so the recovery rates will be different than a policy currently in healthy status, since the future claim situs is unknown.

A sample table is shown below for sample ages of disablement (rates shown are on a monthly basis):

Policyholder Status: Healthy
Benefit Period: Lifetime
Gender: Female
Restoration of Benefits: No
Situs: Nursing Home (original, since policy is healthy)
Tax-Qualified Status: Not tax-qualified
Elimination Period: 1 to 89 days

Disability Month	Disablement Age			
	65	75	85	95
1	3.35%	2.36%	1.65%	1.40%
2	6.71%	4.71%	3.30%	2.80%
3	4.96%	3.49%	2.44%	2.07%
4	3.70%	2.60%	1.82%	1.54%
5	2.86%	2.01%	1.40%	1.19%
6	1.75%	1.23%	0.86%	0.73%
7	1.15%	0.81%	0.56%	0.48%
8	0.73%	0.51%	0.36%	0.30%
9	0.52%	0.37%	0.26%	0.22%
10	0.47%	0.33%	0.23%	0.20%
11	0.43%	0.30%	0.21%	0.18%
12	0.40%	0.28%	0.19%	0.17%
...

Utilization Overview

The utilization assumption in the model for expense reimbursement policies represent the amounts, or severity, of paid claims and include components for cost of care, coverage available and the intensity of care (“health trend”). The available benefit is also considered by capping paid claims at the daily benefit amount.

Expense reimbursement refers to policies that are reimbursed up to the maximum daily benefit. They are considered separately from indemnity policies because indemnity policies pay the full maximum daily benefit. Expense reimbursement claim amounts are affected by cost of care inflation, intensity of care (referred to as “health trend”), and the amount of initial coverage purchased.

Health trends represent the intensity of care needed for claimants. Health trend is the ratio of inflation-adjusted paid claims divided by initial available benefits:

$$\text{Health Trend} = \frac{\text{Paid Claim}}{\text{Initial Available Benefits} \times (1 + \text{CostOfCare Inflation})^{(\text{Experience Year} - \text{Issu Year})}}$$

Indemnity policies have separate utilization assumptions from expense reimbursement policies because they pay their full available benefits and are not dependent on cost or intensity of care. Although indemnity policies pay the full maximum daily benefit, utilization rates are still below 100% because insureds are not in facilities 100% of the time. For example, if an insured is only in a facility 28 out of the 30 days in each month, then they would have a utilization rate equal to

28/30 = 93%. This is because benefit periods are based on service days and not strictly calendar days.

The utilization cost of care assumption is based on statutory valuation assumptions.

Utilization Actual to Expected Analysis

The below table summarizes the results of the experience study for ILTC utilization rates, which includes experience over the past seven years:

Best-Estimate Utilization A/E Results – All Policies Individual Long Term Care												
Calendar Year	Current Claims						Future Claims					
	Maximum Available Benefit (\$millions)	Actual Paid Claims (\$millions)	Actual Utilization Rate	Expected Paid Claims (\$millions)	Expected Utilization Rate	Actual / Expected	Maximum Available Benefit (\$millions)	Actual Paid Claims (\$millions)	Actual Utilization Rate	Expected Paid Claims (\$millions)	Expected Utilization Rate	Actual / Expected
2013	675	471	70%	461	68%	102%	675	471	70%	474	70%	99%
2014	748	518	69%	508	68%	102%	748	518	69%	523	70%	99%
2015	824	562	68%	552	67%	102%	824	652	68%	567	69%	99%
2016	909	623	69%	607	67%	103%	909	623	69%	623	69%	100%
2017	978	666	68%	649	66%	103%	978	666	68%	667	68%	100%
2018	1,052	707	67%	692	66%	102%	1,052	707	67%	712	68%	99%
2019	1,117	747	67%	732	66%	102%	1,117	747	67%	750	67%	100%
Total	6,302	4,294	68%	4,201	67%	102%	6,302	4,294	68%	4,316	68%	99%

Utilization Assumption

The health trend component of utilization tables are two-dimensional that vary by age of disability and disability duration. The first five years of the tables contain monthly rates and are annual thereafter. These tables vary by the following:

- Benefit Period (lifetime vs non-lifetime)
- Inflation type (simple, compound, none)
- Home health care percentage (0%, 1%-50%, 50%-75%, 75%+)
- The situs of the claim (Nursing Home, Home Health Care, Assisted Living Facility)
- Diagnosis of the claim (for insureds currently on claim)

In addition, the situs varies on whether the policyholder is healthy (original situs) versus disabled (current situs). A sample health trend table is shown below for sample ages of disablement (rates shown are on a monthly basis):

Insured Status: Disabled

Benefit Period: Non-Lifetime

Inflation Type: Compound

Home Health Care Percentage: N/A (since situs is not home health care)

Situs: Assisted Living Facility (current, since policy is disabled)

Payment Type: Reimbursement

Diagnosis: Other

Disability Month	Disablement Age			
	65	75	85	95
1	99%	91%	88%	90%
2	60%	66%	72%	74%
3	69%	75%	80%	85%
4	63%	65%	72%	77%
5	70%	72%	79%	82%
6	71%	75%	79%	82%
7	76%	76%	81%	85%
8	76%	77%	82%	85%
9	76%	77%	81%	83%
10	79%	77%	82%	85%
11	80%	80%	83%	86%
12	79%	80%	83%	86%
...

Cost of care tables are two-dimensional vectors that vary by calendar year and inflation type for reimbursement policies. The average cost of care is summarized below:

Cost of Care - ILTC		
Inflation Type	Historical Rate	Ultimate Rate
None	0.12%	0.53%
Simple	2.52%	2.93%
Compound	3.97%	4.38%

Disabled Life Mortality Overview

Once an insured is on claim, there is an associated probability that the insured will decrement due to death, which influences the overall length of a claim. Generally, the probability of death from a currently disabled insured is greater than the probability associated with a currently healthy insured, so separate assumptions are developed and modeled.

Disabled Life Mortality Actual to Expected Analysis

The below table summarizes the results of the experience study for ILTC disabled mortality rates, which includes experience over the past five years:

Best-Estimate Disabled Mortality A/E Results Individual Long Term Care									
Calendar Year	Actuals			Current Claims			Future Claims		
	Exposures	Disabled Deaths	Disabled Mortality Rate	Expected Disabled Deaths	Expected Disabled Mortality Rate	Actual / Expected	Expected Disabled Deaths	Expected Disabled Mortality Rate	Actual / Expected
2015	13,645	4,172	30.6%	4,008	29.4%	104%	4,013	29.4%	104%
2016	14,228	4,183	29.4%	4,196	29.5%	100%	4,197	29.5%	100%
2017	14,699	4,376	29.8%	4,359	29.7%	100%	4,363	29.7%	100%
2018	15,003	4,431	29.5%	4,460	29.7%	99%	4,478	29.8%	99%
2019	15,113	4,416	29.2%	4,531	30.0%	97%	4,544	30.0%	97%
Total	72,688	21,578	29.7%	21,554	29.7%	100%	21,595	29.7%	100%

Disabled Life Mortality Assumption

The disabled life mortality rates are two-dimensional tables that vary by age of disability and disability duration. Similar to the other severity assumptions, the first five years of the tables contain monthly rates and are annual thereafter. The disabled life mortality tables vary by the following:

- Benefit period (lifetime vs non-lifetime)
- The situs of the claim (Nursing Home, Home Health Care, Assisted Living Facility)
- Gender
- Diagnosis of the claim (for insureds currently on claim)

Insureds that are currently in claim status have a known situs of care, so the disabled life mortality rates will be different than a policy currently in healthy status, since the future claim situs is unknown.

A sample table is shown below for sample ages of disablement (rates shown are on a monthly basis):

Insured Status: Healthy

Benefit Period: Non-Lifetime

Situs: Nursing Home (original, since policy is healthy)

Gender: Male

Diagnosis: N/A (since status is healthy)

Disability Month	Disablement Age			
	65	75	85	95
1	2.14%	3.15%	3.58%	4.25%
2	2.84%	4.17%	4.74%	5.62%
3	3.07%	4.50%	5.11%	6.07%

4	3.46%	5.07%	5.76%	6.84%
5	3.07%	4.51%	5.12%	6.08%
6	2.68%	3.93%	4.47%	5.31%
7-12	2.10%	3.008%	3.50%	4.16%
13-18	1.80%	2.65%	3.05%	3.77%
19-24	1.82%	2.68%	3.08%	3.81%
25-36	2.07%	3.03%	3.53%	4.61%
37-48	2.23%	3.19%	3.76%	5.22%
49-60	2.47%	3.41%	4.06%	6.04%
...

Transitions of Situs

Following the annual claim reserve review, adjustments were made to the assumptions to account for transitions of situs. The result of these adjustments produced smoother claim development and a better fit in the dynamic validation. The following tables summarize these adjustments.

Claim Closures (Recovery & Disabled Life Mortality)									
Product	Gender	Benefit Period	1-12	13-24	25-36	37-48	49-60	61-72	>72
ILTC	Female	Unlimited	1.00	1.00	1.00	1.00	1.00	1.00	1.00
		Limited	1.00	1.00	0.80	0.80	0.90	1.00	1.00
	Male	Unlimited	1.00	1.00	1.00	1.00	1.00	1.00	0.75
		Limited	1.00	1.00	0.80	0.80	0.90	1.00	0.75

Utilization									
Product	Payment Type	Inflation Type	1-12	13-24	25-36	37-48	49-60	61-72	>72
ILTC	Exp. Inc.	C	1.20	1.20	1.20	1.20	1.20	1.20	1.20
		S	1.20	1.20	1.20	1.20	1.20	1.20	1.20
		N	1.20	1.20	1.20	1.20	1.20	1.20	1.20
	Indemnity	C	1.05	1.05	1.05	1.05	1.05	1.05	1.05
		S	1.05	1.05	1.05	1.05	1.05	1.05	1.05
		N	1.05	1.05	1.05	1.05	1.05	1.05	1.05

Persistency

In the projection system, the persistency assumptions relate to the probability that policyholders not on claim will lapse or die. Policyholder reduced benefit options are considered part of the persistency assumption and are modeled as partial lapses in the projection system. The persistency of an insured is driven by following key assumptions:

- Voluntary Lapse

- Shock Lapse and Reduced Benefit Option (“RBO”)
- Shock Mortality
- Healthy Life Mortality
- Healthy Life Mortality Improvement

A further breakdown of these components is described below.

Voluntary Lapse Overview

The voluntary lapse assumption reflects the probability associated with an insured voluntarily canceling their policy. The voluntary lapse rates differ from shock lapse rates in that the policy cancellation is not due to a rate increase notification.

Voluntary Lapse Actual to Expected Analysis

The below table summarizes the results of the experience study for ILTC voluntary lapse rates, which includes experience over the past seven years:

Best-Estimate Base Voluntary Lapse A/E Results Individual Long Term Care						
Calendar Year	Exposures (Years)	Actual Lapse	Expected Lapse	Actual Lapse Rate	Expected Lapse Rate	Actual / Expected
2013	206,775	1,879	1,678	0.91%	0.75%	112%
2014	193,954	1,703	1,458	0.88%	0.70%	117%
2015	182,172	1,403	1,283	0.77%	0.67%	109%
2016	170,825	1,250	1,145	0.73%	0.65%	109%
2017	160,433	1,045	1,039	0.65%	0.64%	101%
2018	150,258	1,059	965	0.71%	0.65%	110%
2019	140,168	857	906	0.61%	0.65%	95%
Total	1,246,574	9,197	8,474	0.76%	0.70%	109%

Voluntary Lapse Assumption

The voluntary lapse tables are one-dimensional varying by policy duration. The voluntary lapse assumptions vary by the following:

- Benefit Period (lifetime vs non-lifetime)
- Inflation Type (simple, compound, none)
- Product
- Limited Pay Adjustment

A sample voluntary lapse table is shown below:

Product: ILTC

Benefit Period: Lifetime

Inflation Type: None

Policy Duration	Base Voluntary Lapse Rate
1	7.45%
2	4.45%
3	3.45%
4	2.95%
5	2.55%
6	2.20%
7	1.90%
8	1.65%
9	1.45%
10	1.25%
11	1.05%
12	0.95%
13	0.90%
14	0.85%
15	0.80%
16+	0.75%

Shock Lapse and Reduced Benefit Option

The shock lapse and RBO assumptions are modeled as an increase in lapse rates in response to a rate increase. Shock lapse and RBO assumptions are determined by calculating the lapse rates in excess of base lapse rates during the years when a premium rate action occurs.

The assumed rates for each of these components are outlined in the below table for the ILTC product:

Rate Increase	Total Additional Lapse % from Shock and RBO*
0%	0.00%
5%	0.47%
10%	1.18%
15%	1.87%
20%	2.56%
25%	3.24%
30%	3.90%

35%	4.56%
40%	5.21%
45%	5.84%
50%	6.47%
55%	7.09%
60%	7.69%
65%	8.29%
70%	8.88%
75%	9.46%
80%	10.02%
85%	10.37%
90%	10.72%
95%	11.07%
100%	11.42%
...	...

Healthy Life Mortality Overview

The healthy life mortality assumption is the probability of death associated with currently healthy insureds.

Healthy Life Mortality Actual to Expected Analysis

The below table summarizes the results of the experience study for ILTC healthy life mortality rates, which includes experience from 2013 to 2019:

Best-Estimate Healthy Life Mortality A/E Results Individual Long Term Care						
Calendar Year	Exposures (Years)	Actual Death	Expected Death	Actual Death Rate	Expected Death Rate	Actual / Expected
2013	207,435	4,559	4,751	2.20%	2.29%	96%
2014	197,707	4,787	4,663	2.46%	2.39%	103%
2015	182,998	4,194	4,102	2.29%	2.24%	102%
2016	171,680	3,918	3,990	2.28%	2.32%	98%
2017	161,263	3,558	3,680	2.21%	2.28%	97%
2018	151,054	3,700	3,369	2.45%	2.23%	110%
2019	140,904	3,165	3,070	2.25%	2.18%	103%
Total	1,210,040	27,881	27,624	2.30%	2.28%	101%

Healthy Life Mortality Assumption

The base table for the healthy life mortality assumption is the 2012 IAM table, with additional multipliers based on company experience. There are also adjustments at higher attained ages,

due to lack of credibility. At higher ages, the assumptions grade their credibility weighting from 100% of the best-estimate assumption at age 95, to 100% of the 2012 IAM tables at ages 105 and later. These base tables vary by gender and attained age. The additional multipliers to these base tables based on CCC's experience are as follows:

Category	Variable/Benefit Feature	Adjustment Factors
Attained Age	0-59	68%
	60-64	61%
	65-69	60%
	70-74	114%
	75-79	107%
	80-84	93%
	85-89	83%
	90-94	91%
Gender	Male	100%
	Female	90%
Underwriting Class	Preferred	85%
	Standard	131%
	Substandard	160%
Calendar Year	2014 and Prior	1.00
	2015	0.90
	2016	0.90
	2017	0.85
	2018	0.80
	2019	0.75
	2020	0.70
	2021	0.70
	2022	0.70
	2023	0.75
	2024	0.80
	2025	0.85
	2026	0.90
	2027	0.95
	2028+	1.00

Healthy Life Mortality Improvement

A healthy life mortality improvement factor is applied to the base healthy mortality table to reflect studies that examine the improvement of population mortality over time, based on improvement scale G2. The healthy life mortality improvement varies by gender and attained age with improvement beginning 1/1/2017 for 10 years. An example is shown below for reference:

Gender: Female

Attained Age	Annualized Improvement
<=50	1.00%
50	1.00%
60	1.30%
70	1.30%
80	1.30%
90	0.60%
100	0.20%
105	0.00%

6. Discount Rate

The inforce count-weighted average maximum statutory valuation interest rate for contract reserves of 4.50% is used to accumulate past actual experience and discount future expectations.

7. Expenses

This filing is based on loss ratios and expense levels have not been considered. Commissions are not paid on rate increase premiums.

8. Marketing Method

These policies were sold directly through non-captive agents.

9. Underwriting Description

These policy forms were fully underwritten with the use of various tools in addition to the application, which may have included medical records, an attending physician's statement, telephone interviews, and/or face-to-face assessments.

10. Premiums

Premiums are unisex and payable for life unless the insured selected a limited pay option. The premiums may vary by issue age, elimination period, benefit period / lifetime maximum, initial daily benefit amount,

level of home health care coverage, inflation type, premium mode, underwriting class, marital status, and the selection of any other options or riders.

11. Modal Premium Factors

The following modal factors remain unchanged and are applied to the annual premium to obtain the modal premium.

Payment Mode	Modal Factor	Nationwide Premium Distribution at Dec. 31, 2020
Annual	1.000	61.2%
Semi-Annual	0.520	8.3%
Quarterly	0.270	12.0%
Monthly	0.090	18.6%

12. Issue Age Range

Issue ages range from 18 to 84.

13. Area Factors

Area factors are not used for these policy forms.

14. Average Annualized Premium

The average annualized premium for the policy forms subject to the rate increase request, both before and after the impact of the requested rate increase, is included in Exhibit 1.

15. Number of Insureds

The current number of insureds as of December 31, 2020 can be found in Exhibit 1.

16. Distribution of Business

The historical experience reflects the actual distribution of insureds during the experience period. The current distribution of business as of December 31, 2020 was used to project future experience. Exhibit 2 contains the distribution of the inforce insureds by key demographic and benefit characteristics.

17. Claim Liability and Reserves

Active life reserves have not been used in this rate increase analysis. Claim reserves as of December 31, 2020 have been discounted to the incurral date of each respective claim and included in historical incurred claims. Incurred but not reported reserve (“IBNR”) balances and terminated but not reported reserve (“TBNR”) balances as of December 31, 2020 have been allocated to a calendar year of incurral and included in historical incurred claims.

18. Trend Assumptions

As this is not medical insurance, explicit medical cost trends have not been included in the projections.

19. Experience – Past and Future

Earned premiums and incurred claims, projected through 2079 are developed from a first-principles actuarial model representing actual contracts in-force as of December 31, 2020. The assumptions described in Section 5 are used to project earned premiums and incurred claims.

Waived premiums are not included as premiums nor claims in either the actual historical or the projected future experience.

Historical results reflect earned premium by calendar year with claims captured by incurral year. That is, incurred claims for a calendar year represent all payments through December 31, 2020 for a claim incurred in a particular calendar year plus any claim reserve held as of December 31, 2020. Incurred claims also include IBNR and TBNR held as of December 31, 2020.

Exhibit 3 presents nationwide experience as described in Section 21 for all forms affected by this rate increase to ensure maximum credibility. Although we believe the State-specific data is not credible on its own, we are including State-specific experience through December 31, 2020 for reference in Exhibit 4.

Annual loss ratios are calculated, with and without interest, as incurred claims divided by earned premiums.

A lifetime loss ratio as of December 31, 2020 is calculated as the sum of accumulated past experience and discounted future expectations using the nationwide inforce count-weighted average maximum statutory valuation interest rate for contract reserves.

20. History of Rate Adjustments

See Exhibit 1 for a history of prior rate adjustments in your state.

21. Ensuring No Cross-Subsidization Between States

We have ensured no state's rate increase approvals will subsidize other states' experience. Rate increase requests will vary by state, but only to reflect the timing and amount of prior rate increases approved by that state. This is accomplished by first backing-out all prior rate increases from our nationwide premium data. We then reintroduce prior rate increases with the amount and timing based on your state's prior approvals (as referenced in Section 19). The current proposed rate increase(s) are then determined.

Although some states may have capped our previous inforce rate increase filings, it is the intention of CCC's management that subsequent filings will be submitted at a later date until an actuarially equivalent amount is achieved.

22. Requested Rate Increase and Demonstration of Satisfaction of Requirements

CCC is requesting a rate increase on the policy forms included in this filing, to be implemented over one year. The rate increase varies by benefit period and AIB rider as follows:

Preferred Advantage	Policies with AIB Rider	Policies without AIB Rider
Unlimited Lifetime Max Benefits	60.0%	35.0%
Non-Lifetime Max Benefits	35.0%	0.0%

TQ	Policies with AIB Rider	Policies without AIB Rider
Unlimited Lifetime Max Benefits	60.0%	35.0%
Non-Lifetime Max Benefits	35.0%	0.0%

Please see the Supplement to Rate Sheet for details on the implementation schedule.

Corresponding rate schedules reflecting the increase are included with this filing. Although this request is less than CCC can justify, we are limiting our rate increase request at this time. CCC will continue to monitor the experience of this block and take appropriate actions when necessary.

Upon approval of this rate revision, CCC will communicate to insureds their options to reduce the impact of the rate increase. These options may include increasing the elimination period, reducing the lifetime maximum, reducing the daily benefit or eliminating optional riders. Because the requested rate increase applies to policies with an AIB rider, insureds with an AIB rider who choose to drop it (i.e. Freeze and Drop) will:

- Not be subject to the AIB rate increase;
- Retain their inflated benefits as of the effective date of the coverage change; and
- Be charged an original issue age premium based on the original non-inflated benefits.

Available options will depend upon the insured's current coverage levels, benefit options available under their specific policy form, and any statutory minimum benefit levels in your state.

In addition, the Company is making a number of alternative options available for all insureds in conjunction with this rate increase. The first option provides an Increased Contingent Non-Forfeiture ("ICNF") benefit upon lapse. If this benefit is elected by the insured, the insured will not have to pay prospective premium, and their remaining benefit pool amount will equate to 150% of lifetime premiums paid, capped at current remaining lifetime benefits.

The second option that is being offered to insureds is the "Surrender Option". If this option is elected by the insured, the insured will surrender their policy in return for a one-time cash payment from the Company. The amount of the one-time cash surrender payment is equal to the unisex-adjusted statutory active life reserve held for the specific insured.

Both of the above alternative options will be offered to all insureds in your state, regardless of whether or not they receive a rate increase, in order to ensure fairness within the product portfolio. If a policy lapses due to non-payment of premiums without notifying the Company of the insured's intention to elect any of the above options, the insured's coverage will default to a standard 100% CNF benefit.

Note that the actual rates implemented may vary slightly from those filed due to implementation rounding algorithms.

Satisfaction of minimum required loss ratio requirements is demonstrated in Exhibit 1. This approach shows that with the requested rate increase, the expected lifetime loss ratio exceeds the minimum loss ratio requirement.

23. Proposed Effective Date

The rate increase will apply to policies on their next policy anniversary date following a notification period at least as long as required by your state following approval. No insured will receive more than one increase in a 12 month period.

24. Actuarial Certification

I am an Associate of the Society of Actuaries and a Member of the American Academy of Actuaries. I meet the Academy's qualification standards to render this actuarial opinion and am familiar with the filing requirements for long term care insurance premium and rate increases.

This memorandum has been prepared in conformity with all applicable Actuarial Standards of Practice ("ASOP"), including, but not limited to, the following:

- ASOP 7, "Analysis of Life, Health, or Property/Casualty Insurer Cash Flows";

- ASOP 8, “Regulatory Filings for Health Benefits, Accident and Health Insurance, and Entities Providing Health Benefits”;
- ASOP 18, “Long Term Care Insurance”;
- ASOP 23, “Data Quality”; and
- ASOP 41, “Actuarial Communications”.

I have relied upon policy and claim information extracts, as of December 31, 2020, which contain a seriatim listing of all insureds covered under CCC Long Term Care insurance contracts. I have also relied upon associated paid premium extracts providing details of payment dates and amounts. I have also relied upon associated paid claim extracts providing details by claim regarding payment dates, service dates, benefit types and payment amounts. This information was provided by CCC’s Long Term Care Operations team in partnership with our Third Party Administrator.

I have relied upon statutory reserves as of December 31, 2020, for Claims Reserves, Incurred but Not Reported reserves, and Terminated but Not Reported Reserves, provided by CCC’s Long Term Care Finance and Reserving team.

I have relied upon actuarial assumptions developed by CCC’s Long Term Care Projections and Experience Studies team, which develops assumptions primarily for asset and reserve adequacy analysis, under the direction of the opining actuary, John Munro, FSA, MAAA, who approved those assumptions in collaboration with other CCC Long Term Care actuaries, including Inforce Management actuaries. These assumptions present the actuary’s best judgement, as of December 31, 2020. We have reviewed these assumptions for reasonableness and consistency for use in this filing.

I hereby certify that, to the best of my knowledge and judgement, this rate filing is in compliance with the applicable laws and regulations of your state. In my opinion, the actuarial assumptions are appropriate and the rates are neither excessive nor unfairly discriminatory.



Louis Scarim, ASA, MAAA
 Actuarial Consulting Director, LTC Inforce Management
 (312) 822-6179
louis.scarim@cna.com

February 23, 2022

Date

25. Exhibit Listing

- Exhibit 1: State-Specific Information
- Exhibit 2: Distribution of Inforce Insureds
- Exhibit 3: Nationwide Experience and Projections
- Exhibit 4: State-Specific Experience and Projections



May 6, 2022

Michael Humphreys
Acting Insurance Commissioner
Pennsylvania Insurance Department
1326 Strawberry Square
Harrisburg, PA 17120

Louis Scarim, ASA, MAAA
Actuarial Consulting Director
Long Term Care Pricing
Telephone 312-822-6179
Email louis.scarim@cna.com

Re: Continental Casualty Company
(NAIC #218-20443, FEIN#36-2114545)
SERFF Tracking # CNAB-133114869
Rate Increase Filing for OP Gen2 (Preferred Advantage, TQ)
Individual Long Term Care Policy Forms:

Dear Mr. Hibbert:

Thank you for your review of the above referenced filing. This letter is in response to your objection dated March 9, 2022. The objection items are restated below in *italics*, with responses in [blue](#):

1. *Please provide a table in an Excel spreadsheet (perhaps similar to Exhibit 3a – Lifetime Benefits & Standard Inflation) for this nationwide block of Preferred Advantage policies which shows the historical and projected nationwide earned premium and incurred claims on a calendar year basis assuming no rate increase is granted. Please restate the nationwide historical and projected earned premium so that the business from inception appears to have all been earned at the original rate level. The original rate level is the rate level that would have existed if no increase was ever granted on any policy nationwide. Answer this question considering only the policies represented in Exhibit 3a (i.e. Preferred Advantage Lifetime Benefits & Standard Inflation).*

[Please see the attached “Item 1 – Exhibit 3a_Original Rate Level.xlsx” worksheet, containing the adjusted Nationwide experience exhibit, restated to the Original Rate Level \(i.e., with all rate increase assumptions removed\).](#)

2. *Please provide the percent of active Preferred Advantage policyholders remaining on a nationwide basis. How many Preferred Advantage policies were issued nationwide? How many policies remain in force nationwide? Answer this question considering only the policies represented in Exhibit 3a (i.e. Preferred Advantage Lifetime Benefits & Standard Inflation).*

[Please see the figures shown below:](#)

Total Policies Issued	11,694
Total Policies Inforce	4,781
Percent of Policies Remaining Inforce	40.9%

3. *Please provide the cumulative weighted average increase granted on policies in force on this block in PA. Answer this question considering only the policies represented in Exhibit 3a (i.e. Preferred Advantage Lifetime Benefits & Standard Inflation).*

For PA Preferred Advantage policies With Lifetime Benefits & With Standard Inflation (represented in Exhibit 3a), the cumulative rate increase approved amount is 192.6%.

4. *Please provide a table in an Excel spreadsheet (perhaps similar to Exhibit 3b – without Lifetime Benefits & with Standard Inflation) for this nationwide block of Preferred Advantage policies which shows the historical and projected nationwide earned premium and incurred claims on a calendar year basis assuming no rate increase is granted. Please restate the nationwide historical and projected earned premium so that the business from inception appears to have all been earned at the original rate level. The original rate level is the rate level that would have existed if no increase was ever granted on any policy nationwide. Answer this question considering only the policies represented in Exhibit 3b (i.e. Preferred Advantage without Lifetime Benefits & with Standard Inflation).*

Please see the attached “**Item 4 – Exhibit 3b_Original Rate Level.xlsx**” worksheet, containing the adjusted Nationwide experience exhibit, restated to the Original Rate Level (i.e., with all rate increase assumptions removed).

5. *Please provide the percent of active Preferred Advantage policyholders remaining on a nationwide basis. How many Preferred Advantage policies were issued nationwide? How many policies remain in force nationwide? Answer this question considering only the policies represented in Exhibit 3b (i.e. Preferred Advantage without Lifetime Benefits & with Standard Inflation).*

Please see the figures shown below:

Total Policies Issued	22,733
Total Policies Inforce	6,150
Percent of Policies Remaining Inforce	27.1%

6. *Please provide the cumulative weighted average increase granted on policies in force on this block in PA. Answer this question considering only the policies represented in Exhibit 3b (i.e. Preferred Advantage without Lifetime Benefits & with Standard Inflation).*

For PA Preferred Advantage policies Without Lifetime Benefits & With Standard Inflation (represented in Exhibit 3b), the cumulative rate increase approved amount is 192.6%.

7. Please provide a table in an Excel spreadsheet (perhaps similar to Exhibit 3c – with Lifetime Benefits & without Standard Inflation) for this nationwide block of Preferred Advantage policies which shows the historical and projected nationwide earned premium and incurred claims on a calendar year basis assuming no rate increase is granted. Please restate the nationwide historical and projected earned premium so that the business from inception appears to have all been earned at the original rate level. The original rate level is the rate level that would have existed if no increase was ever granted on any policy nationwide. Answer this question considering only the policies represented in Exhibit 3c (i.e. Preferred Advantage with Lifetime Benefits & without Standard Inflation).

Please see the attached [“Item 7 – Exhibit 3c_Original Rate Level.xlsx”](#) worksheet, containing the adjusted Nationwide experience exhibit, restated to the Original Rate Level (i.e., with all rate increase assumptions removed).

8. Please provide the percent of active Preferred Advantage policyholders remaining on a nationwide basis. How many Preferred Advantage policies were issued nationwide? How many policies remain in force nationwide? Answer this question considering only the policies represented in Exhibit 3c (i.e. with Preferred Advantage Lifetime Benefits & without Standard Inflation).

Please see the figures shown below:

Total Policies Issued	5,366
Total Policies Inforce	1,252
Percent of Policies Remaining Inforce	23.3%

9. Please provide the cumulative weighted average increase granted on policies in force on this block in PA. Answer this question considering only the policies represented in Exhibit 3c (i.e. Preferred Advantage with Lifetime Benefits & without Standard Inflation).

For PA Preferred Advantage policies With Lifetime Benefits & Without Standard Inflation (represented in Exhibit 3c), the cumulative rate increase approved amount is 192.6%.

10. Please provide a table in an Excel spreadsheet (perhaps similar to Exhibit 3d – with Lifetime Benefits & Standard Inflation) for this nationwide block of TQ policies which shows the historical and projected nationwide earned premium and incurred claims on a calendar year basis assuming no rate increase is granted. Please restate the nationwide historical and projected earned premium so that the business from inception appears to have all been earned at the original rate level. The original rate level is the rate level that would have existed if no increase was ever granted on any policy nationwide. Answer this question considering only the policies represented in Exhibit 3d (i.e. TQ with Lifetime Benefits & Standard Inflation).

Please see the attached [“Item 10 – Exhibit 3d_Original Rate Level.xlsx”](#) worksheet, containing the adjusted Nationwide experience exhibit, restated to the Original Rate Level (i.e., with all rate increase assumptions removed).

11. Please provide the percent of active TQ policyholders remaining on a nationwide basis. How many TQ policies were issued nationwide? How many policies remain in force nationwide? Answer this question considering only the policies represented in Exhibit 3d (i.e. TQ with Lifetime Benefits & Standard Inflation).

Please see the figures shown below:

Total Policies Issued	14,499
Total Policies Inforce	6,612
Percent of Policies Remaining Inforce	45.6%

12. Please provide the cumulative weighted average increase granted on policies in force on this block in PA. Answer this question considering only the policies represented in Exhibit 3d (i.e. TQ with Lifetime Benefits & Standard Inflation).

For PA TQ policies With Lifetime Benefits & With Standard Inflation (represented in Exhibit 3d), the cumulative rate increase approved amount is 163.4%.

13. Please provide a table in an Excel spreadsheet (perhaps similar to Exhibit 3e – without Lifetime Benefits & with Standard Inflation) for this nationwide block of TQ policies which shows the historical and projected nationwide earned premium and incurred claims on a calendar year basis assuming no rate increase is granted. Please restate the nationwide historical and projected earned premium so that the business from inception appears to have all been earned at the original rate level. The original rate level is the rate level that would have existed if no increase was ever granted on any policy nationwide. Answer this question considering only the policies represented in Exhibit 3e (i.e. TQ without Lifetime Benefits & with Standard Inflation).

Please see the attached “**Item 13 – Exhibit 3e_Original Rate Level.xlsx**” worksheet, containing the adjusted Nationwide experience exhibit, restated to the Original Rate Level (i.e., with all rate increase assumptions removed).

14. Please provide the percent of active TQ policyholders remaining on a nationwide basis. How many TQ policies were issued nationwide? How many policies remain in force nationwide? Answer this question considering only the policies represented in Exhibit 3e (i.e. TQ without Lifetime Benefits & with Standard Inflation).

Please see the figures shown below:

Total Policies Issued	29,210
Total Policies Inforce	10,530
Percent of Policies Remaining Inforce	36.0%

15. Please provide the cumulative weighted average increase granted on policies in force on this block in PA. Answer this question considering only the policies represented in Exhibit 3e (i.e. TQ without Lifetime Benefits & with Standard Inflation).

For PA TQ policies Without Lifetime Benefits & With Standard Inflation (represented in Exhibit 3e), the cumulative rate increase approved amount is 163.4%.

16. Please provide a table in an Excel spreadsheet (perhaps similar to Exhibit 3f – with Lifetime Benefits & without Standard Inflation) for this nationwide block of TQ policies which shows the historical and projected nationwide earned premium and incurred claims on a calendar year basis assuming no rate increase is granted. Please restate the nationwide historical and projected earned premium so that the business from inception appears to have all been earned at the original rate level. The original rate level is the rate level that would have existed if no increase was ever granted on any policy nationwide. Answer this question considering only the policies represented in Exhibit 3f (i.e. TQ with Lifetime Benefits & without Standard Inflation).

Please see the attached “**Item 16 – Exhibit 3f_Original Rate Level.xlsx**” worksheet, containing the adjusted Nationwide experience exhibit, restated to the Original Rate Level (i.e., with all rate increase assumptions removed).

17. Please provide the percent of active TQ policyholders remaining on a nationwide basis. How many TQ policies were issued nationwide? How many policies remain in force nationwide? Answer this question considering only the policies represented in Exhibit 3f (i.e. TQ with Lifetime Benefits & without Standard Inflation).

Please see the figures shown below:

Total Policies Issued	5,705
Total Policies Inforce	1,823
Percent of Policies Remaining Inforce	32.0%

18. Please provide the cumulative weighted average increase granted on policies in force on this block in PA. Answer this question considering only the policies represented in Exhibit 3f (i.e. TQ with Lifetime Benefits & without Standard Inflation).

For PA TQ policies With Lifetime Benefits & Without Standard Inflation (represented in Exhibit 3f), the cumulative rate increase approved amount is 163.4%.

19. Please provide a listing of the past requested increases and approved increases by state for this block. Also include a column showing the cumulative increases approved in each state to date.

Please see the attached “**Item 19 - State Status Listing – OP Gen2 (as of 05.03.2022).xlsx**” worksheet, containing the rate increase history by state.

20. *Please provide the letter that will be sent to policyholders to inform them of the increase and their available options.*

Please note that the policyholder notification letters are included in the associated Form Filing under the Supporting Documentation tab — SERFF Tracking # CNAB-133114868, which is currently pending review. . Although, we will provide the same letters within this Rate Filing for convenience.

Please see the two attached notification letters to inform policyholders (depending if the policy is subject to the rate increase):

- With Rate Increase: ***“Item 20 – Notification_ILTC_RI_NW_2021 11042021.pdf”***
- Without Rate Increase: ***“Item 20 – Notification_ILTC_NoRI_NW_2021 11042021.pdf”***

21. *How many Preferred Advantage policies with standard inflation and lifetime benefits are in force in this block? How many were issued on or after 9-15-2002?*

For the block of PA Preferred Advantage policies With Standard Inflation & With Lifetime Benefits that are eligible for rate increases, 312 policies are in force, including 0 policies issued on or after 9/15/2002.

22. *How many Preferred Advantage policies with standard inflation but without lifetime benefits are in force in this block? How many were issued on or after 9-15-2002?*

For the block of PA Preferred Advantage policies With Standard Inflation & Without Lifetime Benefits that are eligible for rate increases, 473 policies are in force, including 0 policies issued on or after 9/15/2002.

23. *How many Preferred Advantage policies without standard inflation but with lifetime benefits are in force in this block? How many were issued on or after 9-15-2002?*

For the block of PA Preferred Advantage policies Without Standard Inflation & With Lifetime Benefits that are eligible for rate increases, 55 policies are in force, including 0 policies issued on or after 9/15/2002.

24. *How many Preferred Advantage policies without standard inflation and without lifetime benefits are in force in this block? How many were issued on or after 9-15-2002?*

For the block of PA Preferred Advantage policies Without Standard Inflation & Without Lifetime Benefits that are eligible for rate increases, 147 policies are in force, including 0 policies issued on or after 9/15/2002.

25. *How many TQ policies with standard inflation and lifetime benefits are in force in this block? How many were issued on or after 9-15-2002?*

For the block of PA TQ policies With Standard Inflation & With Lifetime Benefits that are eligible for rate increases, 562 policies are in force, including 7 policies issued on or after 9/15/2002.

26. *How many TQ policies with standard inflation but without lifetime benefits are in force in this block? How many were issued on or after 9-15-2002?*

For the block of PA TQ policies With Standard Inflation & Without Lifetime Benefits that are eligible for rate increases, 1,041 policies are in force, including 28 policies issued on or after 9/15/2002.

27. *How many TQ policies without standard inflation but with lifetime benefits are in force in this block? How many were issued on or after 9-15-2002?*

For the block of PA TQ policies Without Standard Inflation & With Lifetime Benefits that are eligible for rate increases, 126 policies are in force, including 1 policies issued on or after 9/15/2002.

28. *How many TQ policies without standard inflation and without lifetime benefits are in force in this block? How many were issued on or after 9-15-2002?*

For the block of PA TQ policies Without Standard Inflation & Without Lifetime Benefits that are eligible for rate increases, 396 policies are in force, including 4 policies issued on or after 9/15/2002.

29. *The actuarial memo states that these policies were sold nationally from 1994 through 2004. When were they sold in PA?*

- Preferred Advantage policies were sold and issued in PA in the years 1994-2000.
- TQ policies were sold and issued in PA in the years 1994-2003.

30. *Please define what "standard inflation means". Were any policies issued with non-standard inflation options in this block?*

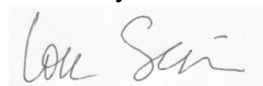
Two optional automatic increase benefit riders were available on these policy forms; a 5% simple lifetime benefit and a 5% compound lifetime benefit. Please note that no insureds were issued with non-standard inflation option in this block.

31. *Continental Casualty has offered the surrender option in the past. The company also offered a conversion option that provided a paid-up benefit of 100% of premium paid plus a cash payment. What is the approximate percent of policyholders that, when offered a cash surrender option, actually choose to exercise it?*

The pilot program conducted over the past year and a half has resulted in approximately 2% of policyholders receiving a cash surrender offer choosing to exercise it.

Please let us know if we can provide additional information to assist in the review of this filing.

Sincerely,



Louis Scarim, ASA, MAAA

<<DATE>>

«FNAME» «MI» «LNAME»
«ADDRESS1»
«ADDRESS2»
«CITY» «STATE» «ZIPCODE»

Long-Term Care Insurance Change Offers

Company: <<COMPANY>>
Policy Number: «POLICY NUMBER»

Dear «FNAME» «LNAME»:

Thank you for choosing <<COMPANY>> for your long-term care insurance needs. We value your business and are committed to being here when you need us the most.

Some long-term care insurance policies, issued by «COMPANY», are incurring a premium rate increase. The premium for your long-term care insurance policy number «POLICY NUMBER», issued on <<ISSUE DATE>> is **not increasing at this time**. However, we are offering you a few limited-time options to help manage the cost of paying for long-term care insurance.

Please note the options listed in this letter are time sensitive and require action on your part.

What is my Current Premium?

You currently pay <<CURRENT PREMIUM AMOUNT>> <<FREQUENCY>> for your long-term care insurance policy.

What are my Options?

We offer several options to help manage the cost of paying for long-term care insurance. These options are offered at <<Company>>'s discretion, and not all of them may be available to you in the future and may not be of equal value to you, so please review this information carefully. We encourage you to consult with your financial or other trusted advisor and a tax advisor before making a selection.

1. Convert to a Paid-up Policy

The Increased Contingent Non-Forfeiture Option allows you to stop paying premiums on your policy, and convert to a paid-up policy that has a reduced maximum lifetime benefit. Your reduced maximum lifetime benefits will be equal to 150% of the premiums you have paid to date, capped at your policy's current remaining maximum lifetime benefits.

To select this option, complete the enclosed Option Election Form and return to <<COMPANY>> within 60 days from the date of this notice.

2. Lower Coverage to Reduce Premium

You may have the option to lower your premiums by reducing aspects of your coverage. Please contact us at 1-888-397-5824 to discuss benefit reduction options.

3. Surrender Your Policy Coverage

This option allows you to surrender your Policy in exchange for a one-time cash payment of <<SURRENDER_PMT>>, which is based on the amount of money currently held by <<COMPANY>> to cover future expected benefit payments. If you elect this option, your Policy will be terminated, and <<COMPANY>> will no longer have to pay any benefits, even if you have already received long-term care services. You will no longer have an active insurance Policy, and it will not be eligible for reinstatement. If you elect this option, you may receive a 1099-MISC form for the tax year in which the option was executed. Please refer to the Surrender Option Election Form for additional details.

This option is available only at this time and may not be available again in the future. To select this option, complete the enclosed Surrender Option Election Form, **sign it and have it notarized** and return to <<COMPANY>> within 60 days from the date of this notice.

IMPORTANT – This option may result in a taxable event for you. Please consult a qualified tax professional or attorney to determine any tax impact to you. <<COMPANY>> does not provide tax advice.

Time to Reverse Decision

If you opt to reduce your benefits or surrender your coverage, your request to reverse any such decision must be in writing, signed by you, and received by us no more than 30 days after the date of our written confirmation of your change.

Choose the Option That is Best for You

As noted above, we are writing to advise you of **voluntary** benefit change options. If you wish to retain your current coverage without changes, you do not need to take action at this time. If you continue to pay your premium at the current amount, the terms of your coverage will not change.

We recommend that you carefully review the options available to you and contact us if you have questions. We encourage you to carefully evaluate your individual situation, the current and projected cost of care in your area, and consider speaking to your family or to a trusted financial or tax adviser before making changes to your coverage. All available options may not be of equal value. In addition, since <<COMPANY>> sold policies with varying benefits to insureds of different ages, these options may be of different value to other insureds.

Please be reminded that, under the terms of your Policy, premium rates are not guaranteed. We regularly monitor experience on long-term care insurance policies and may need to implement increases in the future.

For more information regarding the options described in this letter or if you have any questions, please contact our customer service team at 1-888-397-5824 Monday through Friday, 8:00am to 5:00pm Central Time.

Sincerely,

<<OPERATIONS MANAGER NAME AND TITLE>>

Coverage Change Option Election Form

Policyholder: <<FNAME>> <<LNAME>>

Policy Number: <<POLICY NUMBER>>

To keep your existing coverage, you do not need to take any action.

If you would like to change your coverage, check the corresponding box to indicate your choice, then **sign, date and return to <<COMPANY>> within 60 days from the date of this notice.** This form can be returned via mail to the address below or via fax at 952-983-5193.

Current Coverage Limits (as of <<DATE>>. Coverage changes made after this date are not reflected)

Current <<FREQUENCY>> Premium	\$<<R_DEFAULT_MODAL_PREM>>
Current Daily Maximum Benefit	Up to \$<<CURRENT_DMB>> per day
Remaining Maximum Lifetime Benefit	<<MAXIMUM_LIFETIME_BENEFIT>>
Automatic Increase Benefit	<<ABI_TYPE>>

Options

Check Box	Change Description	New Daily Maximum Benefit	New Maximum Lifetime Benefit	Cash Payment	New <<FREQUENCY>> Premium
<input type="checkbox"/>	Increased Contingent Non-forfeiture ("ICNF")	\$<<CURRENT_DMB>>	\$<<ICNF_LTM*>>	None	\$0.00

*Note: ICNF Maximum Lifetime Benefit is based upon premiums paid as of <<DATE>> and will be finalized once the election has been processed

Signature

Date

Please note:

- You should consider speaking to your family or to a trusted financial adviser before making changes to your coverage. You should also consult a qualified tax professional or attorney to determine any tax impact to you. <<COMPANY>> does not provide tax advice.
- If you have a limited pay policy, please consider how many more premium payments you have left before making changes to your policy.
- If you currently have the Shared Advantage Benefit and are going to make a coverage change, your spouse may need to make the same coverage change.
- Mail your completed form notarization to the following address:

<<COMPANY>> Individual Long-Term Care
P.O Box 64912
St. Paul MN 55164-0912

Surrender Option Election Form

Policyholder: <<FNAME>> <<LNAME>> **Policy Number:** <<POLICY NUMBER>>

To keep your existing coverage, you do not need to take any action.

If you would like to surrender your Policy, check the box on this page, then **sign, date, obtain notarization and return to <<COMPANY>> within 60 days from the date of this notice.** This form can be returned via mail to the address on the back of this form or via fax at 952-983-5193. Please see the other side of this form for additional information.

Current Coverage Limits (as of <<DATE>>. Coverage changes made after this date are not reflected)	
Current <<FREQUENCY>> Premium	\$<<R_DEFAULT_MODAL_PREM>>
Current Daily Maximum Benefit	Up to \$<<CURRENT_DMB>> per day
Remaining Maximum Lifetime Benefit	<<MAXIMUM_LIFETIME_BENEFIT>>
Automatic Increase Benefit	<<ABI_TYPE>>

The surrender option offered herein is nontransferable and void upon death of the named insured. Any person who knowingly and with the intent to defraud the insurance company by electing to surrender this long term care policy and is not the named insured or legal POA is committing a fraudulent act, which is a crime, and subject to criminal and civil penalties.

Options					
Check Box	Change Description	New Daily Maximum Benefit	New Maximum Lifetime Benefit	Cash Payment	New <<FREQUENCY>> Premium
<input type="checkbox"/>	Surrender Option	\$0.00	\$0.00	<<SURRENDER_PMT>>	\$0.00

THIS FORM MUST BE NOTARIZED

Signature
Social Security Number: _____
(Required for 1099MISC)

Date
Phone Number: _____
(Required for possible verification call)

Please Note

- The Surrender Options is non-transferrable and can only be elected by the named insured or legal Power of Attorney if the insured has been diagnosis with a cognitive impairment. Evidence of such diagnosis may be required.
- Some elections will be subject to an additional verbal verification confirmation.
- You should consider speaking to your family or to a trusted financial adviser before making changes to your coverage. You should also consult a qualified tax professional or attorney to determine any tax impact to you. <<COMPANY>> does not provide tax advice.
- If you have a limited pay policy, please consider how many more premium payments you have left before making changes to your policy.
- If you currently have the Shared Advantage Benefit and are going to make a coverage change, your spouse may need to make the same coverage change.
- Mail your completed form with proper notarization to the following address:

<<COMPANY>> Individual Long-Term Care
P.O Box 64912
St. Paul MN 55164-0912

P.O Box 64912
St. Paul MN 55164-0912
1-888-397-5824
Fax: 952-983-5193

<<DATE>>

«FNAME» «MI» «LNAME»
«ADDRESS1»
«ADDRESS2»
«CITY» «STATE» «ZIPCODE»

Long-Term Care Insurance Premium Adjustment Notice

Company: <<COMPANY>>
Policy Number: «POLICY NUMBER»

Dear «FNAME» «LNAME»:

Thank you for choosing <<COMPANY>> for your long-term care insurance needs. We value your business and are committed to being here when you need us the most.

This letter is to inform you that the premium for your long-term care insurance coverage, issued by «COMPANY» on <<ISSUE DATE>>, is going to increase. This letter explains the amount and timing of your premium increase, and the options available to reduce the impact of the premium increase.

How much is my Premium Increase and when does my Bill Increase?

You currently pay <<CURRENT PREMIUM AMOUNT>> <<FREQUENCY>>. This premium amount will increase on the first premium due date on or after <<POLICY_INCR_EFF_DATE>>. Your premium will change as follows:

<u>Rate Increase Effective Date</u>	<u>Percentage Increase</u>	<u>New <<FREQUENCY>> Premium</u>
<<R_POLICY_OFFER_EFF_DATE>>	<<RATE_INCREASE_PERCENTAGE>>	<<R_DEFAULT_MODAL_PREM>>

Why is my Premium Increasing?

The decision to implement a premium increase is a difficult one. <<COMPANY>>, like other long-term care insurers, used certain assumptions when originally setting the premium rate for your policy. These assumptions used the best available information at that time about a variety of factors, including the expected lifespan of Policy holders, the number of insureds going on claim, the length of time insureds would be on claim, and the cost of receiving long-term care services. These assumptions were best estimates of future experience for these policies. Unfortunately, actual experience developed differently than originally expected. More policyholders are utilizing long-term care than expected and the cost of care is higher than expected. Therefore, we have determined that we must increase premiums to reflect the future claim expectations on these policies.

The premium increase has been filed with the state in which your policy was issued, and we are implementing this premium increase in accordance with the laws and regulations of this state. The increase is not due to a change in your health, your age, or your claims history. No individual policyholder has been singled out for a rate increase. Please be reminded that, under the terms of your policy, premium rates are not guaranteed and may be increased again in the future. We will continue to monitor experience on long-term care insurance policies and may need to implement additional increases in the future.

What are my Options?

<<COMPANY>> understands that a rate increase can be difficult, and offers a variety of options to help manage or avoid the increase. These options may not be of equal value to you, so please review this information carefully. We encourage you to consult with your financial or other trusted advisor and a tax advisor before making a selection.

1. Pay the New Premium Amount and Maintain Existing Coverage

If you wish to retain your current coverage without changes, you do not need to take action at this time. Your new increased premium will be reflected on your bill or, if you pay via electronic funds transfer, the withdrawal amount will be adjusted to reflect the premium increase. If you continue to pay your premium at the new amount the terms of your coverage will not change.

2. Convert to a Paid-up Policy

The Increased Contingent Non-Forfeiture option allows you to stop paying premiums on your policy, and convert to a paid-up policy that has a reduced maximum lifetime benefit. Your reduced maximum lifetime benefits will be equal to 150% of the premiums you have paid to date, capped at your policy's current remaining maximum lifetime benefits.

To select this option, complete the enclosed Option Election Form and return to <<COMPANY>> by <<RATE_INC_EFF_DATE + 60 DAY>>.

3. Lower Coverage to Reduce the Impact of the Premium Increase

<<**Remove the Automatic Increase Benefit rider.** Your policy includes an automatic increase benefit rider, which has increased your policy's daily maximum benefit amount by 5% per year to protect against inflation. You can reduce your premium if you discontinue the automatic increase benefit rider. Be assured that your policy's current benefit levels, which include the automatic increases that have already occurred, will remain intact. Please refer to the Option Election Form for additional details>>.

<<**Reduce your Maximum Lifetime Benefit.** Your policy currently has a maximum lifetime benefit of <<MAXIMUM_LIFETIME_BENEFIT>>, which you can reduce to <<MAXIMUM_LIFETIME_BENEFIT – 1 STEP>>. The total Maximum Lifetime Benefit would be based on your daily benefit amount times <<MAXIMUM_LIFETIME_BENEFIT – 1 STEP IN DAYS>>. Please refer to the Coverage Change Option Election Form for additional details>>.

Change or Drop other Benefit Features. You may have the option to lower your premiums by reducing aspects of your coverage. Please contact us at 1-888-397-5824 to discuss benefit reduction options.

4. <<**Surrender Your Policy Coverage**

This option allows you to surrender your Policy in exchange for a one-time cash payment of <<SURRENDER_PMT>>, which is based on the amount of money currently held by <<COMPANY>> to cover future expected benefit payments. If you elect this option, your Policy will be terminated, and <<COMPANY>> will no longer have to pay any benefits, even if you have already received long-term care services. You will no longer have an active insurance Policy, and it will not be eligible for reinstatement. If you elect this option, you may receive a 1099-MISC form for the tax year in which the option was executed. Please refer to the Surrender Option Election Form for additional details.

This option is available only at this time and may not be available again in the future. To select this option, **complete** the enclosed Surrender Option Election Form, **sign it and have it notarized** and return to <<COMPANY>> by <<RATE_INC_EFF_DATE + 60 DAY>>.

IMPORTANT – This option may result in a taxable event for you. Please consult a qualified tax professional or attorney to determine any tax impact to you. <COMPANY>> does not provide tax advice>>.

Time to Reverse Decision

If you opt to change your coverage, your request to reverse any such decision must be in writing, signed by you, and received by us no more than 30 days after the date of our written confirmation of your coverage change.

Choose the Option That is Best for You

We recommend that you carefully review the options available to you and contact us if you have questions. We encourage you to carefully evaluate your individual situation, the current and projected cost of care in your area, and consider speaking to your family or to a trusted financial or tax adviser before making changes to your coverage. All available options may not be of equal value. In addition, since <<COMPANY>> sold policies with varying benefits to insureds of different ages, these options may be of different value to other insureds.

Please be reminded that, under the terms of your Policy, premium rates are not guaranteed. We regularly monitor experience on long-term care insurance policies and may need to implement increases in the future.

For more information regarding the options described in this letter or if you have any questions, please contact our customer service team at 1-888-397-5824 Monday through Friday, 8:00am to 5:00pm Central Time.

This letter is not a bill. However, we recommend that you keep a copy of this letter with your Policy.

Sincerely,

<<OPERATIONS MANAGER NAME AND TITLE>>

Coverage Change Option Election Form

Policyholder: <<FNAME>> <<LNAME>>

Policy Number: <<POLICY NUMBER>>

To keep your existing coverage, you do not need to take any action.

If you would like to change your coverage, check the corresponding box to indicate your choice, then **sign, date and return** to <<COMPANY>> by <<RATE_INC_EFF_DATE + 60 DAY>>. This form can be returned via mail to the address on the back of this form or via fax at 952-983-5193. Please see the other side of this form for additional information.

Current Coverage Limits (as of <<DATE>>. Coverage changes made after this date are not reflected)	
New <<FREQUENCY>> Premium which includes the rate increase	\$<<R_DEFAULT_MODAL_PREM>>
Current Daily Maximum Benefit	Up to \$<<CURRENT_DMB>> per day
Remaining Maximum Lifetime Benefit	<<MAXIMUM_LIFETIME_BENEFIT>>
Automatic Increase Benefit	<<ABI_TYPE>>

Options					
Check Box	Change Description	New Daily Maximum Benefit	New Maximum Lifetime Benefit	Cash Payment	New <<FREQUENCY>> Premium
<input type="checkbox"/>	Increased Contingent Non-forfeiture ("ICNF")	\$<<CURRENT_DMB>>	\$<<ICNF_LTM*>>	None	\$0.00
<input type="checkbox"/>	Remove the Automatic Increase Benefit rider and retain your current daily maximum benefit amounts reflected above	\$<<CURRENT_DMB>>	\$<<ABI_REDUCTION_LTM>>	None	\$<<ABI_REDUCTION_MODAL_PREMIUM>>
<input type="checkbox"/>	Reduce your maximum lifetime benefit period from <<MAXIMUM_LIFETIME_BENEFIT>> to <<MAXIMUM_LIFETIME_BENEFIT - 1 STEP>> years	\$<<CURRENT_DMB>>	\$<<LTM_REDUCTION_LTM>>	None	\$<<LTM_REDUCTION_MODAL_PREMIUM>>

*Note: ICNF Maximum Lifetime Benefit is based upon premiums paid as of <<DATE>> and will be finalized once the election has been processed

Signature

Date

Please note:

- You should consider speaking to your family or to a trusted financial adviser before making changes to your coverage. You should also consult a qualified tax professional or attorney to determine any tax impact to you. <<COMPANY>> does not provide tax advice.
- If you have a limited pay policy, please consider how many more premium payments you have left before making changes to your policy.
- If you currently have the Shared Advantage Benefit and are going to make a coverage change, your spouse may need to make the same coverage change.
- Mail your completed form to the following address:

<<COMPANY>> Individual Long-Term Care
P.O Box 64912
St. Paul MN 55164-0912

Surrender Option Election Form

Policyholder: <<FNAME>> <<LNAME>> **Policy Number:** <<POLICY NUMBER>>

To keep your existing coverage, you do not need to take any action.

If you would like to surrender your Policy, check the box on this page, then **sign, date, obtain notarization and return to <<COMPANY>> by <<RATE_INC_EFF_DATE + 60 DAY>>**. This form can be returned via mail to the address on the back of this form or via fax at 952-983-5193. Please see the other side of this form for additional information.

Current Coverage Limits (as of <<DATE>>. Coverage changes made after this date are not reflected)

New <<FREQUENCY>> Premium which includes the rate increase	\$<<R_DEFAULT_MODAL_PREM>>
Current Daily Maximum Benefit	Up to \$<<CURRENT_DMB>> per day
Remaining Maximum Lifetime Benefit	<<MAXIMUM_LIFETIME_BENEFIT>>
Automatic Increase Benefit	<<ABI_TYPE>>

The surrender option offered herein is nontransferable and void upon death of the named insured. Any person who knowingly and with the intent to defraud the insurance company by electing to surrender this long term care policy and is not the named insured or legal POA is committing a fraudulent act, which is a crime, and subject to criminal and civil penalties.

Options

Check Box	Change Description	New Daily Maximum Benefit	New Maximum Lifetime Benefit	Cash Payment	New <<FREQUENCY>> Premium
<input type="checkbox"/>	Surrender Option	\$0.00	\$0.00	<<SURRENDER_PMT>>	\$0.00

THIS FORM MUST BE NOTARIZED

Signature

Social Security Number: _____
(Required for 1099MISC)

Date

Phone Number: _____
(Required for possible verification call)

Please Note

- The Surrender Options is non-transferrable and can only be elected by the named insured or legal Power of Attorney if the insured has been diagnosis with a cognitive impairment. Evidence of such diagnosis may be required.
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- Mail your completed form with proper notarization to the following address:

<<COMPANY>> Individual Long-Term Care
P.O Box 64912
St. Paul MN 55164-0912



August 8, 2022

Michael Hibbert
Pennsylvania Insurance Department
1326 Strawberry Square
Harrisburg, PA 17120

Louis Scarim, ASA, MAAA
Actuarial Consulting Director
Long Term Care Pricing
Telephone 312-822-6179
Email louis.scarim@cna.com

Re: Continental Casualty Company
(NAIC #218-20443, FEIN#36-2114545)
SERFF Tracking # CNAB-133114869
Rate Increase Filing for OP Gen2 (Preferred Advantage, TQ)
Individual Long Term Care Policy Forms:

Dear Mr. Hibbert:

Thank you for your review of the above referenced filing. This letter is in response to your objection dated July 12, 2022. The objection items are restated below in *italics*, with responses in **blue**:

1. The Department cannot approve your requested increase because our current guidelines do not allow us to approve increases of greater than 30% in any calendar year. Please propose an increase staged over two years such that the cumulative value of the two increases is equal to the original requested increases for each policy and no increase in either year is greater than 30%.

Thank you for your consideration of this filing. We are agreeable to this offer. Please note that we have adjusted the rate increase below to reflect the cost of waiting associated with spreading the increase over multiple years:

			Multiple-Year Request		Total Cumulative Rate Increase
Product	Inflation Type	Benefit Period	Yr 1	Yr 2	
OP Gen2 (PA)	Inflation	Lifetime	30.0%	28.7%	67.3%
OP Gen2 (PA)	Inflation	Non-Lifetime	30.0%	5.5%	37.2%
OP Gen2 (PA)	Non-Inflation	Lifetime	30.0%	4.9%	36.4%
OP Gen2 (TQ)	Inflation	Lifetime	30.0%	28.2%	66.7%
OP Gen2 (TQ)	Inflation	Non-Lifetime	30.0%	5.2%	36.8%
OP Gen2 (TQ)	Non-Inflation	Lifetime	30.0%	5.0%	36.5%

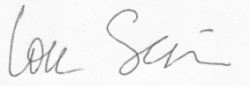
2. Lastly, please provide a seriatim listing of the 2,569 Continental Casualty policies in this block in Excel. Each row within the worksheet must contain the policy's unique identification number, form number, series (i.e. TQ or Preferred Advantage), issue age, issue date, inflation status indicator, benefit period, and Continental Casualty's suggested premium increase in each year of the proposed implementation period.

Please see attached seriatim listing labeled "PA Seriatim Insured – GEN2 Final.xlsx".

We also have provided a summary of the impact of the cost of waiting, along with the nationwide experience exhibits that shows the lifetime loss ratios with the rate increases spread over two years are the same as the lifetime loss ratios with the single rate increase.

Please let us know if we can provide additional information to assist in the review of this filing. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Lou Scarim", is placed over a light gray rectangular background.

Louis Scarim, ASA, MAAA

Pennsylvania Cost of Waiting Analysis

Filing	Product	Benefit Cohort	Requested Rate Increase	NW LLR with Requested Increase	2-Year Implementation that Results in Same NW LLR	What the Second Year Increase Would be Without the Cost of Waiting
GEN1	LTC1	Infl+Life	34.5%	179.9%	$30\% \times 5.9\% = 37.7\%$	3.46%
GEN1	Premier/Classic	Infl+Life	27.3%	156%	n/a	0.00%
GEN2	Pref Adv	Infl+Life	60.0%	136.3%	$30\% \times 28.7\% = 67.31\%$	23.08%
GEN2	Pref Adv	Infl+ Non-Life	35.0%	103.7%	$30\% \times 5.5\% = 37.15\%$	3.85%
GEN2	Pref Adv	Non-Infl+Life	35.0%	108.5%	$30\% \times 4.9\% = 36.37\%$	3.85%
GEN2	TQ	Infl+Life	60.0%	130.9%	$30\% \times 28.2\% = 66.66\%$	23.08%
GEN2	TQ	Infl+ Non-Life	35.0%	99.6%	$30\% \times 5.2\% = 36.76\%$	3.85%
GEN2	TQ	Non-Infl+Life	35.0%	98.8%	$30\% \times 5.0\% = 36.5\%$	3.85%

Exhibit 3a
Continental Casualty Company
Preferred Advantage - Policy Forms with Lifetime Benefits & Standard Inflation
Nationwide Historical and Projected Experience Restated with Approved Pennsylvania Rate Increases
NW Lifetime Loss Ratio Exhibit Using 2-Year Rate Increase Implementation

Year	Without Rate Increase				With 2-Year Increase (30% followed by 28.7%)			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1988	-	-	0%	0%	-	-	0%	0%
1989	-	-	0%	0%	-	-	0%	0%
1990	-	-	0%	0%	-	-	0%	0%
1991	-	-	0%	0%	-	-	0%	0%
1992	-	-	0%	0%	-	-	0%	0%
1993	-	-	0%	0%	-	-	0%	0%
1994	11,507	-	0%	0%	11,507	-	0%	0%
1995	1,484,582	53,457	4%	4%	1,484,582	53,457	4%	4%
1996	7,240,570	454,360	6%	6%	7,240,570	454,360	6%	6%
1997	15,336,337	1,938,742	13%	10%	15,336,337	1,938,742	13%	10%
1998	17,559,418	2,061,341	12%	11%	17,559,418	2,061,341	12%	11%
1999	17,590,794	2,877,064	16%	12%	17,590,794	2,877,064	16%	12%
2000	17,185,180	5,254,984	31%	17%	17,185,180	5,254,984	31%	17%
2001	16,669,041	6,988,228	42%	21%	16,669,041	6,988,228	42%	21%
2002	16,249,784	4,256,177	26%	22%	16,249,784	4,256,177	26%	22%
2003	15,837,037	7,144,016	45%	25%	15,837,037	7,144,016	45%	25%
2004	22,702,998	7,054,321	31%	26%	22,702,998	7,054,321	31%	26%
2005	22,405,588	11,897,795	53%	29%	22,405,588	11,897,795	53%	29%
2006	20,406,606	12,784,964	63%	33%	20,406,606	12,784,964	63%	33%
2007	20,021,377	12,340,215	62%	36%	20,021,377	12,340,215	62%	36%
2008	19,413,946	13,465,167	69%	38%	19,413,946	13,465,167	69%	38%
2009	18,787,773	20,925,118	111%	44%	18,787,773	20,925,118	111%	44%
2010	17,966,585	19,921,652	111%	48%	17,966,585	19,921,652	111%	48%
2011	17,432,663	15,207,833	87%	51%	17,432,663	15,207,833	87%	51%
2012	18,664,322	23,719,390	127%	56%	18,664,322	23,719,390	127%	56%
2013	19,846,510	24,196,139	122%	60%	19,846,510	24,196,139	122%	60%
2014	19,142,435	24,305,443	127%	63%	19,142,435	24,305,443	127%	63%
2015	17,744,886	35,390,865	199%	70%	17,744,886	35,390,865	199%	70%
2016	17,753,745	32,153,741	181%	75%	17,753,745	32,153,741	181%	75%
2017	18,785,940	43,589,722	232%	83%	18,785,940	43,589,722	232%	83%
2018	17,692,254	46,172,900	261%	90%	17,692,254	46,172,900	261%	90%
2019	17,534,674	45,519,801	260%	97%	17,534,674	45,519,801	260%	97%
2020	18,865,706	42,726,782	226%	103%	18,865,706	42,726,782	226%	103%
Total Actual	450,332,257	462,400,217	103%	103%	450,332,257	462,400,217	103%	103%
Projected								
2021	18,624,980	51,191,446	275%	110%	19,588,487	50,792,152	259%	109%
2022	17,348,681	59,185,472	341%	118%	22,316,113	59,526,931	267%	116%
2023	15,959,212	56,330,103	353%	125%	24,265,912	54,977,816	227%	122%
2024	14,584,080	58,325,762	400%	133%	22,595,456	54,010,799	239%	126%
2025	13,229,495	59,705,566	451%	141%	20,496,766	55,288,525	270%	132%
2026	11,909,460	60,663,080	509%	149%	18,451,606	56,175,201	304%	137%
2027	10,634,827	61,253,970	576%	157%	16,476,785	56,722,377	344%	143%
2028	9,414,892	61,251,815	651%	166%	14,586,713	56,720,381	389%	149%
2029	8,258,991	60,373,976	731%	174%	12,795,848	55,907,485	437%	155%
2030	7,188,078	58,824,051	818%	182%	11,136,657	54,472,224	489%	161%
2031	6,212,862	56,652,155	912%	190%	9,625,732	52,461,006	545%	166%
2032	5,331,730	54,055,460	1014%	197%	8,260,574	50,056,416	606%	172%
2033	4,542,000	51,112,828	1125%	204%	7,037,027	47,331,480	673%	177%
2034	3,840,687	47,729,225	1243%	211%	5,950,467	44,198,198	743%	182%
2035	3,223,496	44,055,396	1367%	217%	4,994,238	40,796,160	817%	187%
2036	2,685,320	40,129,953	1494%	223%	4,160,429	37,161,123	893%	192%
2037	2,220,034	36,181,880	1630%	228%	3,439,551	33,505,130	974%	195%
2038	1,821,480	32,242,936	1770%	232%	2,822,061	29,857,591	1058%	199%
2039	1,483,115	28,349,477	1911%	237%	2,297,825	26,252,171	1142%	202%
2040	1,198,540	24,623,406	2054%	240%	1,856,926	22,801,757	1228%	205%
2041	961,325	21,153,593	2200%	243%	1,489,404	19,588,642	1315%	207%
2042	765,443	18,017,088	2354%	246%	1,185,918	16,684,177	1407%	210%
2043	605,107	15,180,651	2509%	248%	937,506	14,057,580	1499%	211%
2044	474,988	12,662,246	2666%	250%	735,910	11,725,488	1593%	213%
2045	370,293	10,448,193	2822%	251%	573,704	9,675,231	1686%	214%
2046	286,794	8,566,763	2987%	253%	444,337	7,932,990	1785%	215%
2047	220,572	7,008,631	3177%	254%	341,738	6,490,130	1899%	216%
2048	168,532	5,674,273	3367%	255%	261,111	5,254,488	2012%	217%
2049	127,953	4,563,496	3567%	255%	198,240	4,225,887	2132%	217%
2050	96,498	3,624,182	3756%	256%	149,506	3,356,064	2245%	218%
2051	72,325	2,857,113	3950%	256%	112,055	2,645,743	2361%	218%
2052	53,869	2,243,855	4165%	257%	83,460	2,077,854	2490%	218%
2053	39,891	1,745,056	4375%	257%	61,804	1,615,956	2615%	218%
2054	29,391	1,349,389	4591%	257%	45,536	1,249,561	2744%	219%
2055	21,525	1,037,056	4818%	257%	33,350	960,334	2880%	219%
2056	15,676	785,741	5012%	257%	24,288	727,611	2996%	219%
2057	11,329	589,758	5206%	258%	17,552	546,127	3112%	219%
2058	8,134	433,870	5334%	258%	12,602	401,772	3188%	219%
2059	5,799	311,887	5379%	258%	8,984	288,813	3215%	219%
2060	4,104	220,899	5383%	258%	6,358	204,556	3217%	219%
2061	2,882	155,627	5400%	258%	4,465	144,113	3227%	219%
2062	2,003	110,296	5507%	258%	3,103	102,137	3291%	219%
2063	1,371	78,528	5727%	258%	2,124	72,718	3423%	219%
2064	927	54,964	5931%	258%	1,436	50,898	3545%	219%
2065	620	37,739	6085%	258%	961	34,947	3637%	219%
2066	409	26,111	6377%	258%	634	24,179	3811%	219%
2067	267	17,908	6704%	258%	414	16,583	4007%	219%
2068	171	11,916	6961%	258%	265	11,035	4160%	219%
2069	107	7,368	6854%	258%	167	6,823	4096%	219%
2070	66	4,365	6608%	258%	102	4,042	3949%	219%
2071	40	2,520	6357%	258%	61	2,333	3800%	219%
2072	23	1,411	6090%	258%	36	1,306	3640%	219%
2073	13	767	5830%	258%	20	710	3485%	219%
2074	7	406	5594%	258%	11	376	3344%	219%
2075	4	207	5344%	258%	6	192	3194%	219%
2076	2	102	5126%	258%	3	95	3064%	219%
2077	1	49	4991%	258%	2	45	2983%	219%
2078	0	22	4730%	258%	1	20	2827%	219%
2079	0	9	4166%	258%	0	8	2490%	219%
Total Projected	164,060,422	1,121,222,008	683%	683%	239,892,349	1,049,196,486	437%	437%
Total Lifetime	614,392,679	1,583,622,225	258%	258%	690,224,606	1,511,596,703	219%	219%
Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates								
Past	804,373,104	651,349,029	81%	81%	804,373,104	651,349,029	81%	81.0%
Future	126,182,637	736,925,922	584%	584%	181,748,607	692,662,118	381%	381.1%
Lifetime	930,555,741	1,388,274,951	149%	149%	986,121,711	1,344,011,147	136%	136.3%

Exhibit 3b
Continental Casualty Company
Preferred Advantage - Policy Forms without Lifetime Benefits & with Standard Inflation
Nationwide Historical and Projected Experience Restated with Approved Pennsylvania Rate Increases
NW Lifetime Loss Ratio Exhibit Using 2-Year Rate Increase Implementation

Year	Without Rate Increase				With 2-Year Increase (30% followed by 5.5%)			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1988	-	-	0%	0%	-	-	0%	0%
1989	-	-	0%	0%	-	-	0%	0%
1990	-	-	0%	0%	-	-	0%	0%
1991	-	-	0%	0%	-	-	0%	0%
1992	-	-	0%	0%	-	-	0%	0%
1993	-	-	0%	0%	-	-	0%	0%
1994	13,832	-	0%	0%	13,832	-	0%	0%
1995	1,736,563	17,628	1%	1%	1,736,563	17,628	1%	1%
1996	9,963,526	327,051	3%	3%	9,963,526	327,051	3%	3%
1997	21,887,707	928,688	4%	4%	21,887,707	928,688	4%	4%
1998	23,364,277	2,630,290	11%	7%	23,364,277	2,630,290	11%	7%
1999	23,831,198	2,524,812	11%	8%	23,831,198	2,524,812	11%	8%
2000	23,040,394	4,473,518	19%	10%	23,040,394	4,473,518	19%	10%
2001	22,374,811	5,053,831	23%	13%	22,374,811	5,053,831	23%	13%
2002	21,796,491	6,906,546	32%	15%	21,796,491	6,906,546	32%	15%
2003	21,030,108	6,582,966	31%	17%	21,030,108	6,582,966	31%	17%
2004	29,713,532	8,049,251	27%	19%	29,713,532	8,049,251	27%	19%
2005	29,330,001	12,324,831	42%	22%	29,330,001	12,324,831	42%	22%
2006	26,348,223	10,780,840	41%	24%	26,348,223	10,780,840	41%	24%
2007	25,554,001	12,847,096	50%	26%	25,554,001	12,847,096	50%	26%
2008	24,601,554	16,837,313	68%	30%	24,601,554	16,837,313	68%	30%
2009	23,669,446	18,762,252	79%	33%	23,669,446	18,762,252	79%	33%
2010	22,149,675	22,390,582	101%	38%	22,149,675	22,390,582	101%	38%
2011	21,302,094	23,176,224	109%	42%	21,302,094	23,176,224	109%	42%
2012	22,163,839	27,850,882	126%	46%	22,163,839	27,850,882	126%	46%
2013	22,887,495	33,729,250	147%	52%	22,887,495	33,729,250	147%	52%
2014	21,393,807	38,289,204	179%	58%	21,393,807	38,289,204	179%	58%
2015	19,154,290	46,580,854	243%	66%	19,154,290	46,580,854	243%	66%
2016	18,553,664	41,157,554	222%	72%	18,553,664	41,157,554	222%	72%
2017	19,184,368	39,225,705	204%	77%	19,184,368	39,225,705	204%	77%
2018	17,711,053	44,780,647	253%	83%	17,711,053	44,780,647	253%	83%
2019	17,078,086	44,278,814	259%	89%	17,078,086	44,278,814	259%	89%
2020	17,088,788	43,739,316	256%	94%	17,088,788	43,739,316	256%	94%
Total Actual	546,922,821	514,245,944	94%	94%	546,922,821	514,245,944	94%	94%
Projected								
2021	16,773,996	45,567,666	272%	99%	17,641,748	45,212,239	256%	99%
2022	15,258,893	50,721,838	332%	105%	18,886,514	51,340,271	272%	105%
2023	13,635,323	46,331,950	340%	111%	17,802,200	46,553,496	262%	109%
2024	12,050,633	45,929,983	381%	116%	15,808,223	43,931,262	278%	114%
2025	10,552,114	44,875,559	425%	122%	13,842,441	42,922,723	310%	118%
2026	9,153,389	43,347,074	474%	127%	12,007,570	41,460,752	345%	122%
2027	7,863,959	41,487,781	528%	132%	10,316,074	39,682,370	385%	126%
2028	6,679,346	39,113,875	586%	136%	8,762,078	37,411,768	427%	130%
2029	5,601,585	36,330,867	649%	141%	7,348,254	34,749,867	473%	134%
2030	4,658,261	33,384,697	717%	145%	6,110,786	31,931,905	523%	138%
2031	3,842,244	30,368,491	790%	149%	5,040,321	29,046,955	576%	141%
2032	3,145,759	27,399,126	871%	152%	4,126,659	26,206,807	635%	144%
2033	2,556,579	24,502,141	958%	155%	3,353,764	23,435,889	699%	147%
2034	2,063,415	21,701,254	1052%	158%	2,706,823	20,756,887	767%	149%
2035	1,653,763	19,033,978	1151%	161%	2,169,435	18,205,682	839%	151%
2036	1,316,502	16,541,067	1256%	163%	1,727,010	15,821,254	916%	153%
2037	1,040,829	14,257,879	1370%	165%	1,365,377	13,637,423	999%	155%
2038	817,206	12,167,733	1489%	166%	1,072,024	11,638,233	1086%	156%
2039	637,199	10,278,587	1613%	168%	835,889	9,831,296	1176%	157%
2040	493,462	8,606,274	1744%	169%	647,332	8,231,757	1272%	158%
2041	379,603	7,138,206	1880%	170%	497,970	6,827,575	1371%	159%
2042	289,951	5,881,454	2028%	171%	380,363	5,625,513	1479%	160%
2043	219,887	4,801,233	2184%	171%	288,451	4,592,299	1592%	161%
2044	165,591	3,878,754	2342%	172%	217,225	3,709,963	1708%	161%
2045	123,919	3,116,343	2515%	172%	162,558	2,980,730	1834%	161%
2046	92,212	2,484,226	2694%	173%	120,965	2,376,121	1964%	162%
2047	68,271	1,972,162	2889%	173%	89,559	1,886,340	2106%	162%
2048	50,312	1,561,010	3103%	173%	66,000	1,493,080	2262%	162%
2049	36,934	1,230,839	3333%	173%	48,450	1,177,277	2430%	162%
2050	27,015	970,159	3591%	173%	35,439	927,941	2618%	162%
2051	19,713	761,208	3861%	174%	25,860	728,083	2815%	163%
2052	14,345	594,654	4145%	174%	18,818	568,777	3023%	163%
2053	10,398	460,676	4431%	174%	13,640	440,628	3230%	163%
2054	7,512	353,204	4702%	174%	9,855	337,833	3428%	163%
2055	5,399	268,266	4969%	174%	7,082	256,592	3623%	163%
2056	3,854	199,327	5171%	174%	5,056	190,653	3771%	163%
2057	2,734	145,929	5337%	174%	3,587	139,578	3892%	163%
2058	1,924	105,890	5503%	174%	2,524	101,282	4012%	163%
2059	1,343	76,353	5684%	174%	1,762	73,030	4144%	163%
2060	927	55,400	5975%	174%	1,216	52,989	4356%	163%
2061	631	39,159	6209%	174%	827	37,455	4527%	163%
2062	421	25,855	6138%	174%	553	24,730	4476%	163%
2063	275	16,405	5969%	174%	361	15,692	4352%	163%
2064	175	10,143	5807%	174%	229	9,701	4234%	163%
2065	108	6,071	5627%	174%	142	5,806	4103%	163%
2066	65	3,521	5452%	174%	85	3,368	3975%	163%
2067	37	1,988	5327%	174%	49	1,901	3884%	163%
2068	21	1,087	5229%	174%	27	1,040	3813%	163%
2069	11	573	5129%	174%	15	548	3740%	163%
2070	6	289	5010%	174%	8	277	3653%	163%
2071	3	139	4843%	174%	4	133	3531%	163%
2072	1	62	4475%	174%	2	59	3263%	163%
2073	1	25	3993%	174%	1	24	2911%	163%
2074	0	9	3495%	174%	0	8	2548%	163%
2075	0	3	2987%	174%	0	3	2178%	163%
2076	0	1	2475%	174%	0	1	1804%	163%
2077	0	0	1967%	174%	0	0	1434%	163%
2078	0	0	1472%	174%	0	0	1073%	163%
2079	0	0	995%	174%	0	0	726%	163%
Total Projected	121,318,058	648,108,442	534%	534%	153,569,203	626,595,869	408%	408%
Total Lifetime	668,240,879	1,162,354,387	174%	174%	700,492,024	1,140,841,813	163%	163%
Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates								
Past	1,007,277,212	721,416,227	72%	72%	1,007,277,212	721,416,227	72%	71.6%
Future	97,098,931	463,555,019	477%	477%	121,974,173	449,624,449	369%	368.6%
Lifetime	1,104,376,142	1,184,971,246	107%	107%	1,129,251,385	1,171,040,676	104%	103.7%

Exhibit 3c
Continental Casualty Company
Preferred Advantage - Policy Forms with Lifetime Benefits & without Standard Inflation
Nationwide Historical and Projected Experience Restated with Approved Pennsylvania Rate Increases
NW Lifetime Loss Ratio Exhibit Using 2-Year Rate Increase Implementation

Year	Without Rate Increase				With 2-Year Increase (30% followed by 4.9%)			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1988	-	-	0%	0%	-	-	0%	0%
1989	-	-	0%	0%	-	-	0%	0%
1990	-	-	0%	0%	-	-	0%	0%
1991	-	-	0%	0%	-	-	0%	0%
1992	-	-	0%	0%	-	-	0%	0%
1993	-	-	0%	0%	-	-	0%	0%
1994	17,949	-	0%	0%	17,949	-	0%	0%
1995	1,032,814	493,845	48%	47%	1,032,814	493,845	48%	47%
1996	4,028,053	376,908	9%	17%	4,028,053	376,908	9%	17%
1997	7,573,734	1,796,407	24%	21%	7,573,734	1,796,407	24%	21%
1998	8,145,831	2,869,025	35%	27%	8,145,831	2,869,025	35%	27%
1999	7,978,612	3,351,693	42%	31%	7,978,612	3,351,693	42%	31%
2000	7,692,522	4,820,451	63%	38%	7,692,522	4,820,451	63%	38%
2001	7,357,818	5,030,873	68%	43%	7,357,818	5,030,873	68%	43%
2002	7,107,917	6,819,144	96%	50%	7,107,917	6,819,144	96%	50%
2003	6,770,467	6,364,574	94%	55%	6,770,467	6,364,574	94%	55%
2004	9,446,391	5,263,590	56%	55%	9,446,391	5,263,590	56%	55%
2005	8,879,587	6,176,234	70%	57%	8,879,587	6,176,234	70%	57%
2006	8,100,374	5,714,307	71%	58%	8,100,374	5,714,307	71%	58%
2007	7,774,623	6,094,029	78%	60%	7,774,623	6,094,029	78%	60%
2008	7,282,599	9,693,067	133%	65%	7,282,599	9,693,067	133%	65%
2009	6,902,864	10,780,475	156%	71%	6,902,864	10,780,475	156%	71%
2010	6,345,839	8,652,796	136%	75%	6,345,839	8,652,796	136%	75%
2011	5,924,144	10,480,048	177%	80%	5,924,144	10,480,048	177%	80%
2012	6,011,778	10,572,043	176%	85%	6,011,778	10,572,043	176%	85%
2013	5,987,929	7,585,583	127%	87%	5,987,929	7,585,583	127%	87%
2014	5,524,041	12,936,539	234%	93%	5,524,041	12,936,539	234%	93%
2015	5,007,123	6,869,037	137%	94%	5,007,123	6,869,037	137%	94%
2016	4,844,551	9,583,515	198%	98%	4,844,551	9,583,515	198%	98%
2017	5,007,556	8,536,691	170%	100%	5,007,556	8,536,691	170%	100%
2018	4,460,156	7,859,766	176%	102%	4,460,156	7,859,766	176%	102%
2019	3,743,769	9,035,648	241%	106%	3,743,769	9,035,648	241%	106%
2020	3,467,489	10,958,232	316%	110%	3,467,489	10,958,232	316%	110%
Total Actual	162,416,532	178,714,520	110%	110%	162,416,532	178,714,520	110%	110%
Projected								
2021	3,593,089	10,309,848	287%	114%	3,778,967	10,229,431	271%	114%
2022	3,154,519	10,657,918	338%	118%	3,900,849	10,790,674	277%	117%
2023	2,735,195	9,088,624	332%	121%	3,556,855	9,142,813	257%	120%
2024	2,353,850	8,435,161	358%	125%	3,074,270	8,078,629	263%	123%
2025	2,009,016	7,733,868	385%	128%	2,623,895	7,406,978	282%	125%
2026	1,700,138	7,048,778	415%	130%	2,220,483	6,750,844	304%	127%
2027	1,426,050	6,388,776	448%	133%	1,862,506	6,118,739	329%	129%
2028	1,185,075	5,738,919	484%	135%	1,547,784	5,496,350	355%	131%
2029	975,705	5,091,319	522%	137%	1,274,330	4,876,123	383%	133%
2030	797,640	4,471,487	561%	139%	1,041,766	4,282,489	411%	134%
2031	648,351	3,899,718	601%	141%	846,785	3,734,887	441%	136%
2032	524,055	3,362,680	642%	142%	684,448	3,220,548	471%	137%
2033	421,293	2,884,587	685%	143%	550,234	2,762,663	502%	138%
2034	336,728	2,449,779	728%	144%	439,787	2,346,233	533%	139%
2035	267,581	2,054,397	768%	145%	349,477	1,967,563	563%	140%
2036	211,376	1,706,525	807%	146%	276,070	1,634,394	592%	140%
2037	165,973	1,402,925	845%	147%	216,771	1,343,627	620%	141%
2038	129,531	1,138,386	879%	147%	169,175	1,090,269	644%	141%
2039	100,401	911,619	908%	148%	131,130	873,087	666%	142%
2040	77,321	718,121	929%	148%	100,986	687,768	681%	142%
2041	59,174	559,563	946%	148%	77,284	535,911	693%	142%
2042	44,968	432,460	962%	148%	58,731	414,181	705%	143%
2043	33,919	329,494	971%	149%	44,301	315,567	712%	143%
2044	25,397	247,577	975%	149%	33,170	237,113	715%	143%
2045	18,884	182,826	968%	149%	24,664	175,099	710%	143%
2046	13,932	133,754	960%	149%	18,196	128,100	704%	143%
2047	10,186	97,126	954%	149%	13,304	93,021	699%	143%
2048	7,388	69,568	942%	149%	9,650	66,628	690%	143%
2049	5,322	49,064	922%	149%	6,951	46,990	676%	143%
2050	3,803	34,455	906%	149%	4,967	32,999	664%	143%
2051	2,697	24,114	894%	149%	3,522	23,094	656%	143%
2052	1,892	16,793	888%	149%	2,471	16,083	651%	143%
2053	1,319	11,582	878%	149%	1,722	11,092	644%	143%
2054	915	7,823	855%	149%	1,196	7,493	627%	143%
2055	631	5,332	845%	149%	824	5,107	620%	143%
2056	430	3,650	849%	149%	562	3,496	622%	143%
2057	290	2,470	853%	149%	378	2,366	625%	143%
2058	191	1,636	855%	149%	250	1,567	627%	143%
2059	123	1,033	839%	149%	161	989	615%	143%
2060	78	611	788%	149%	101	585	578%	143%
2061	48	353	738%	149%	62	338	541%	143%
2062	29	199	689%	149%	38	190	505%	143%
2063	17	109	640%	149%	22	104	469%	143%
2064	10	58	591%	149%	13	55	434%	143%
2065	5	30	551%	149%	7	29	404%	143%
2066	3	15	515%	149%	4	14	378%	143%
2067	1	7	480%	149%	2	7	352%	143%
2068	1	3	443%	149%	1	3	325%	143%
2069	0	1	400%	149%	0	1	293%	143%
2070	0	1	344%	149%	0	1	252%	143%
2071	0	0	289%	149%	0	0	212%	143%
2072	0	0	239%	149%	0	0	175%	143%
2073	0	0	193%	149%	0	0	142%	143%
2074	0	0	149%	149%	0	0	109%	143%
2075	0	0	113%	149%	0	0	83%	143%
2076	0	0	79%	149%	0	0	58%	143%
2077	0	0	26%	149%	0	0	19%	143%
2078	0	0	0%	149%	0	0	0%	143%
2079	0	0	0%	149%	0	0	0%	143%
Total Projected	23,044,546	97,705,142	424%	424%	28,949,120	94,952,333	328%	328%
Total Lifetime	185,461,079	276,419,662	149%	149%	191,365,652	273,666,853	143%	143%
Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates								
Past	310,604,434	289,405,344	93%	93%	310,604,434	289,405,344	93%	93.2%
Future	18,740,596	74,846,734	399%	399%	23,363,409	72,969,413	312%	312.3%
Lifetime	329,345,030	364,252,078	111%	111%	333,967,843	362,374,758	109%	108.5%

Exhibit 3d
Continental Casualty Company
TQ - Policy Forms with Lifetime Benefits & Standard Inflation
Nationwide Historical and Projected Experience Restated with Approved Pennsylvania Rate Increases
NW Lifetime Loss Ratio Exhibit Using 2-Year Rate Increase Implementation

Year	Without Rate Increase				With 2-Year Increase (30% followed by 28.2%)			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1988	-	-	0%	0%	-	-	0%	0%
1989	-	-	0%	0%	-	-	0%	0%
1990	-	-	0%	0%	-	-	0%	0%
1991	-	-	0%	0%	-	-	0%	0%
1992	-	-	0%	0%	-	-	0%	0%
1993	(1,808)	-	0%	0%	(1,808)	-	0%	0%
1994	4,260	-	0%	0%	4,260	-	0%	0%
1995	66,907	-	0%	0%	66,907	-	0%	0%
1996	178,960	-	0%	0%	178,960	-	0%	0%
1997	2,993,879	1,740	0%	0%	2,993,879	1,740	0%	0%
1998	14,019,879	537,489	4%	3%	14,019,879	537,489	4%	3%
1999	21,865,249	902,327	4%	4%	21,865,249	902,327	4%	4%
2000	22,623,725	4,317,492	19%	9%	22,623,725	4,317,492	19%	9%
2001	22,345,625	5,300,491	24%	13%	22,345,625	5,300,491	24%	13%
2002	22,350,109	4,324,383	19%	14%	22,350,109	4,324,383	19%	14%
2003	21,829,896	8,406,372	39%	19%	21,829,896	8,406,372	39%	19%
2004	21,185,654	7,567,765	36%	21%	21,185,654	7,567,765	36%	21%
2005	25,818,889	6,651,129	26%	22%	25,818,889	6,651,129	26%	22%
2006	26,191,738	9,895,469	38%	24%	26,191,738	9,895,469	38%	24%
2007	25,261,390	9,161,785	36%	25%	25,261,390	9,161,785	36%	25%
2008	24,587,834	11,834,705	48%	27%	24,587,834	11,834,705	48%	27%
2009	23,958,173	17,238,326	72%	31%	23,958,173	17,238,326	72%	31%
2010	23,071,327	18,087,214	78%	35%	23,071,327	18,087,214	78%	35%
2011	22,422,160	16,365,053	73%	38%	22,422,160	16,365,053	73%	38%
2012	23,819,416	24,892,408	105%	42%	23,819,416	24,892,408	105%	42%
2013	25,507,295	31,518,119	124%	48%	25,507,295	31,518,119	124%	48%
2014	24,723,238	26,067,414	105%	51%	24,723,238	26,067,414	105%	51%
2015	23,260,602	35,749,972	154%	57%	23,260,602	35,749,972	154%	57%
2016	23,527,255	40,236,783	171%	63%	23,527,255	40,236,783	171%	63%
2017	25,019,119	44,247,469	177%	69%	25,019,119	44,247,469	177%	69%
2018	23,915,938	40,762,800	170%	74%	23,915,938	40,762,800	170%	74%
2019	23,463,966	54,563,717	233%	81%	23,463,966	54,563,717	233%	81%
2020	24,741,388	53,629,008	217%	88%	24,741,388	53,629,008	217%	88%
Total Actual	538,752,064	472,259,431	88%	88%	538,752,064	472,259,431	88%	88%
Projected								
2021	25,148,370	54,382,726	216%	93%	26,449,346	53,958,540	204%	93%
2022	23,775,772	64,585,212	272%	101%	30,554,545	64,957,824	213%	99%
2023	22,220,510	62,983,020	283%	107%	33,665,360	61,471,019	183%	104%
2024	20,640,829	66,904,420	324%	114%	31,855,079	61,954,805	194%	108%
2025	19,043,815	70,287,265	369%	122%	29,390,401	65,087,385	221%	113%
2026	17,445,518	73,299,368	420%	130%	26,923,742	67,876,651	252%	118%
2027	15,860,057	75,892,455	479%	138%	24,476,894	70,277,901	287%	124%
2028	14,299,780	77,728,040	544%	146%	22,068,911	71,977,689	326%	130%
2029	12,779,866	78,716,521	616%	155%	19,723,222	72,893,042	370%	136%
2030	11,337,263	78,839,579	695%	163%	17,496,877	73,006,995	417%	142%
2031	9,987,290	78,007,930	781%	171%	15,413,428	72,236,872	469%	148%
2032	8,735,112	76,249,064	873%	180%	13,480,936	70,608,128	524%	154%
2033	7,584,790	73,729,395	972%	188%	11,705,638	68,274,865	583%	160%
2034	6,537,186	70,543,644	1079%	196%	10,088,866	65,324,797	647%	166%
2035	5,591,207	66,770,899	1194%	203%	8,628,934	61,831,162	717%	171%
2036	4,745,762	62,449,293	1316%	210%	7,324,155	57,829,269	790%	176%
2037	3,997,957	57,727,706	1444%	216%	6,170,064	53,456,987	866%	181%
2038	3,341,946	52,743,430	1578%	222%	5,157,640	48,841,450	947%	186%
2039	2,771,758	47,633,344	1719%	227%	4,277,665	44,109,410	1031%	190%
2040	2,281,401	42,517,830	1864%	232%	3,520,896	39,372,344	1118%	194%
2041	1,863,842	37,556,237	2015%	237%	2,876,476	34,777,812	1209%	197%
2042	1,511,654	32,842,373	2173%	240%	2,332,942	30,412,681	1304%	200%
2043	1,217,175	28,480,384	2340%	244%	1,878,471	26,373,394	1404%	202%
2044	973,118	24,458,961	2513%	246%	1,501,817	22,649,477	1508%	205%
2045	772,564	20,780,933	2690%	249%	1,192,301	19,243,551	1614%	206%
2046	609,140	17,461,813	2867%	251%	940,089	16,169,981	1720%	208%
2047	477,260	14,520,524	3042%	252%	736,557	13,446,289	1826%	209%
2048	371,667	11,960,366	3218%	254%	573,595	11,075,533	1931%	210%
2049	287,797	9,752,053	3389%	255%	444,159	9,030,592	2033%	211%
2050	221,672	7,876,593	3553%	256%	342,107	7,293,879	2132%	212%
2051	169,905	6,283,576	3698%	257%	262,215	5,818,715	2219%	213%
2052	129,638	4,961,461	3827%	257%	200,071	4,594,411	2296%	213%
2053	98,528	3,876,140	3934%	258%	152,059	3,589,382	2361%	213%
2054	74,645	3,002,800	4023%	258%	115,200	2,780,652	2414%	214%
2055	56,424	2,305,421	4086%	258%	87,079	2,134,865	2452%	214%
2056	42,597	1,758,786	4129%	259%	65,741	1,628,670	2477%	214%
2057	32,160	1,331,260	4140%	259%	49,632	1,232,773	2484%	214%
2058	24,323	1,003,226	4125%	259%	37,538	929,007	2475%	214%
2059	18,474	759,743	4112%	259%	28,511	703,537	2468%	214%
2060	14,116	583,357	4133%	259%	21,785	540,200	2480%	214%
2061	10,884	454,810	4179%	259%	16,798	421,163	2507%	214%
2062	8,481	361,870	4267%	259%	13,089	335,099	2560%	215%
2063	6,676	292,197	4377%	259%	10,302	270,580	2626%	215%
2064	5,315	241,442	4542%	259%	8,203	223,580	2726%	215%
2065	4,275	207,377	4851%	259%	6,597	192,035	2911%	215%
2066	3,470	182,059	5247%	259%	5,355	168,590	3148%	215%
2067	2,835	163,862	5780%	259%	4,376	151,739	3468%	215%
2068	2,320	148,203	6389%	259%	3,580	137,239	3833%	215%
2069	1,899	133,292	7017%	259%	2,931	123,431	4211%	215%
2070	1,552	120,066	7737%	259%	2,395	111,183	4642%	215%
2071	1,249	105,845	8473%	259%	1,928	98,014	5084%	215%
2072	994	90,611	9117%	259%	1,534	83,907	5471%	215%
2073	779	77,173	9813%	259%	1,202	71,464	5948%	215%
2074	599	64,728	10806%	259%	924	59,940	6485%	215%
2075	453	52,511	11587%	259%	699	48,626	6952%	215%
2076	333	40,228	12064%	259%	515	37,252	7239%	215%
2077	238	28,048	11787%	259%	367	25,973	7073%	215%
2078	165	18,069	10927%	259%	255	16,732	6557%	215%
2079	112	11,314	10132%	259%	172	10,477	6079%	215%
Total Projected	247,145,536	1,566,340,853	634%	634%	362,292,166	1,462,359,561	404%	404%
Total Lifetime	785,897,600	2,038,600,284	259%	259%	901,044,231	1,934,618,991	215%	215%
Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates								
Past	920,219,775	641,235,522	70%	70%	920,219,775	641,235,522	70%	69.7%
Future	185,954,310	975,894,767	525%	525%	268,582,210	914,859,496	341%	340.6%
Lifetime	1,106,174,085	1,617,130,289	146%	146%	1,188,801,985	1,556,095,018	131%	130.9%

Exhibit 3e
Continental Casualty Company
TQ - Policy Forms without Lifetime Benefits & with Standard Inflation
Nationwide Historical and Projected Experience Restated with Approved Pennsylvania Rate Increases
NW Lifetime Loss Ratio Exhibit Using 2-Year Rate Increase Implementation

Year	Without Rate Increase				With 2-Year Increase (30% followed by 5.2%)			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1988	-	-	0%	0%	-	-	0%	0%
1989	-	-	0%	0%	-	-	0%	0%
1990	-	-	0%	0%	-	-	0%	0%
1991	-	-	0%	0%	-	-	0%	0%
1992	-	-	0%	0%	-	-	0%	0%
1993	178	-	0%	0%	178	-	0%	0%
1994	18,352	-	0%	0%	18,352	-	0%	0%
1995	113,277	-	0%	0%	113,277	-	0%	0%
1996	305,267	-	0%	0%	305,267	-	0%	0%
1997	5,334,775	21,101	0%	0%	5,334,775	21,101	0%	0%
1998	21,929,861	202,449	1%	1%	21,929,861	202,449	1%	1%
1999	34,077,685	1,186,174	3%	2%	34,077,685	1,186,174	3%	2%
2000	35,122,137	1,749,855	5%	3%	35,122,137	1,749,855	5%	3%
2001	35,157,793	2,313,324	7%	4%	35,157,793	2,313,324	7%	4%
2002	35,177,482	5,660,167	16%	7%	35,177,482	5,660,167	16%	7%
2003	34,790,521	8,809,267	25%	10%	34,790,521	8,809,267	25%	10%
2004	33,695,910	8,153,873	24%	12%	33,695,910	8,153,873	24%	12%
2005	40,920,236	9,168,661	22%	13%	40,920,236	9,168,661	22%	13%
2006	41,034,009	10,459,557	25%	15%	41,034,009	10,459,557	25%	15%
2007	39,560,150	13,335,214	34%	17%	39,560,150	13,335,214	34%	17%
2008	38,331,369	19,398,922	51%	20%	38,331,369	19,398,922	51%	20%
2009	36,984,305	22,700,389	61%	24%	36,984,305	22,700,389	61%	24%
2010	35,253,968	23,668,148	67%	27%	35,253,968	23,668,148	67%	27%
2011	33,935,517	29,390,030	87%	31%	33,935,517	29,390,030	87%	31%
2012	35,108,301	36,258,215	103%	36%	35,108,301	36,258,215	103%	36%
2013	36,450,107	37,842,672	104%	40%	36,450,107	37,842,672	104%	40%
2014	34,571,619	38,248,197	111%	44%	34,571,619	38,248,197	111%	44%
2015	31,654,101	50,787,981	160%	50%	31,654,101	50,787,981	160%	50%
2016	31,379,103	52,300,817	167%	55%	31,379,103	52,300,817	167%	55%
2017	32,463,199	65,843,284	203%	62%	32,463,199	65,843,284	203%	62%
2018	30,129,981	58,727,239	195%	68%	30,129,981	58,727,239	195%	68%
2019	28,615,919	70,586,451	247%	74%	28,615,919	70,586,451	247%	74%
2020	28,744,316	67,593,082	235%	80%	28,744,316	67,593,082	235%	80%
Total Actual	790,859,439	634,405,067	80%	80%	790,859,439	634,405,067	80%	80%
Projected								
2021	28,963,427	61,117,830	211%	85%	30,461,763	60,641,111	199%	85%
2022	26,835,226	70,353,004	262%	90%	33,195,269	71,210,793	215%	90%
2023	24,513,623	66,431,012	271%	96%	31,922,508	66,748,667	209%	94%
2024	22,203,069	68,193,311	307%	101%	29,043,536	65,225,763	225%	98%
2025	19,941,360	69,092,550	346%	106%	26,085,025	66,085,871	253%	102%
2026	17,739,912	69,337,442	391%	112%	23,205,340	66,320,105	286%	107%
2027	15,640,673	68,847,791	440%	117%	20,459,355	65,851,763	322%	111%
2028	13,642,625	67,428,697	494%	122%	17,845,734	64,494,423	361%	116%
2029	11,761,972	65,177,930	554%	128%	15,385,678	62,341,602	405%	120%
2030	10,056,997	62,273,869	619%	133%	13,155,423	59,563,916	453%	124%
2031	8,529,036	58,806,698	689%	137%	11,156,718	56,247,625	504%	128%
2032	7,172,753	54,871,953	765%	142%	9,382,582	52,484,106	559%	132%
2033	5,983,376	50,631,580	846%	146%	7,826,773	48,428,260	619%	136%
2034	4,949,348	46,157,411	933%	150%	6,474,176	44,148,793	682%	139%
2035	4,058,566	41,542,568	1024%	153%	5,308,956	39,734,773	748%	142%
2036	3,298,760	36,883,958	1118%	157%	4,315,064	35,278,890	818%	145%
2037	2,657,684	32,354,735	1217%	159%	3,476,480	30,946,764	890%	147%
2038	2,122,238	28,053,137	1322%	162%	2,776,071	26,832,357	967%	149%
2039	1,679,191	24,016,767	1430%	164%	2,196,527	22,971,636	1046%	151%
2040	1,316,647	20,274,357	1540%	166%	1,722,289	19,392,083	1126%	153%
2041	1,023,220	16,883,816	1650%	167%	1,338,461	16,149,088	1207%	154%
2042	788,380	13,902,083	1763%	168%	1,031,269	13,297,110	1289%	155%
2043	602,260	11,344,276	1884%	169%	787,808	10,850,611	1377%	156%
2044	456,436	9,170,085	2009%	170%	597,057	8,771,033	1469%	157%
2045	343,327	7,346,314	2140%	171%	449,101	7,026,627	1565%	157%
2046	256,497	5,841,435	2277%	171%	335,520	5,587,235	1665%	158%
2047	190,500	4,609,328	2420%	172%	249,191	4,408,746	1769%	158%
2048	140,796	3,623,305	2573%	172%	184,173	3,465,630	1882%	158%
2049	103,602	2,836,674	2738%	172%	135,520	2,713,231	2002%	159%
2050	75,954	2,208,164	2907%	173%	99,355	2,112,072	2126%	159%
2051	55,532	1,705,431	3071%	173%	72,640	1,631,216	2246%	159%
2052	40,514	1,310,195	3234%	173%	52,996	1,253,179	2365%	159%
2053	29,518	1,001,439	3393%	173%	38,612	957,860	2481%	159%
2054	21,498	761,084	3540%	173%	28,121	727,964	2589%	159%
2055	15,663	570,979	3645%	173%	20,489	546,132	2665%	159%
2056	11,434	421,929	3690%	173%	14,957	403,568	2698%	159%
2057	8,387	309,523	3691%	173%	10,970	296,054	2699%	159%
2058	6,188	225,803	3649%	173%	8,095	215,977	2668%	159%
2059	4,608	162,530	3527%	173%	6,028	155,457	2579%	159%
2060	3,475	115,678	3328%	173%	4,546	110,644	2434%	159%
2061	2,661	82,173	3087%	173%	3,481	78,598	2258%	159%
2062	2,080	58,405	2808%	173%	2,721	55,863	2053%	159%
2063	1,664	43,508	2615%	173%	2,176	41,615	1912%	159%
2064	1,362	35,037	2572%	173%	1,782	33,512	1881%	159%
2065	1,140	30,948	2715%	173%	1,491	29,601	1985%	159%
2066	971	30,466	3136%	173%	1,271	29,140	2293%	159%
2067	841	30,575	3636%	173%	1,100	29,245	2658%	159%
2068	732	31,635	4322%	173%	957	30,258	3160%	159%
2069	638	30,959	4851%	173%	835	29,612	3547%	159%
2070	555	30,566	5512%	173%	725	29,236	4031%	159%
2071	476	30,343	6369%	173%	623	29,023	4657%	159%
2072	403	28,348	7028%	173%	528	27,115	5139%	159%
2073	337	26,173	7764%	173%	441	25,034	5677%	159%
2074	277	23,692	8564%	173%	362	22,661	6262%	159%
2075	223	20,800	9345%	173%	291	19,895	6833%	159%
2076	176	17,174	9773%	173%	230	16,426	7146%	159%
2077	134	13,161	9792%	173%	176	12,588	7160%	159%
2078	100	8,865	8847%	173%	131	8,480	6469%	159%
2079	72	5,791	8035%	173%	94	5,539	5875%	159%
Total Projected	237,259,116	1,146,775,293	483%	483%	300,879,592	1,106,182,177	368%	368%
Total Lifetime	1,028,118,555	1,781,180,360	173%	173%	1,091,739,031	1,740,587,244	159%	159%
Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates								
Past	1,380,364,238	849,309,314	62%	62%	1,380,364,238	849,309,314	62%	61.5%
Future	185,764,140	783,663,830	422%	422%	233,818,154	758,239,853	324%	324.3%
Lifetime	1,566,128,377	1,632,973,145	104%	104%	1,614,182,392	1,607,549,167	100%	99.6%

Exhibit 3f
Continental Casualty Company
TQ - Policy Forms with Lifetime Benefits & without Standard Inflation
Nationwide Historical and Projected Experience Restated with Approved Pennsylvania Rate Increases
NW Lifetime Loss Ratio Exhibit Using 2-Year Rate Increase Implementation

Year	Without Rate Increase				With 2-Year Increase (30% followed by 5%)			
	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio	Earned Premium	Incurred Claims	Annual Loss Ratio	Cumulative Loss Ratio
Historical								
1988	-	-	0%	0%	-	-	0%	0%
1989	-	-	0%	0%	-	-	0%	0%
1990	-	-	0%	0%	-	-	0%	0%
1991	-	-	0%	0%	-	-	0%	0%
1992	-	-	0%	0%	-	-	0%	0%
1993	-	-	0%	0%	-	-	0%	0%
1994	5,497	-	0%	0%	5,497	-	0%	0%
1995	20,523	-	0%	0%	20,523	-	0%	0%
1996	79,946	-	0%	0%	79,946	-	0%	0%
1997	1,417,180	422,937	30%	28%	1,417,180	422,937	30%	28%
1998	5,872,017	1,076,240	18%	20%	5,872,017	1,076,240	18%	20%
1999	8,704,592	1,518,074	17%	19%	8,704,592	1,518,074	17%	19%
2000	8,921,621	2,143,431	24%	21%	8,921,621	2,143,431	24%	21%
2001	8,775,283	5,864,155	67%	33%	8,775,283	5,864,155	67%	33%
2002	8,593,837	4,281,308	50%	36%	8,593,837	4,281,308	50%	36%
2003	8,426,666	3,138,027	37%	36%	8,426,666	3,138,027	37%	36%
2004	8,137,050	6,230,138	77%	42%	8,137,050	6,230,138	77%	42%
2005	9,544,307	5,982,287	63%	45%	9,544,307	5,982,287	63%	45%
2006	9,804,328	6,108,563	62%	47%	9,804,328	6,108,563	62%	47%
2007	9,261,594	7,112,728	77%	50%	9,261,594	7,112,728	77%	50%
2008	8,865,145	8,031,265	91%	54%	8,865,145	8,031,265	91%	54%
2009	8,449,792	6,161,705	73%	55%	8,449,792	6,161,705	73%	55%
2010	7,895,756	5,965,659	76%	57%	7,895,756	5,965,659	76%	57%
2011	7,469,753	7,915,712	106%	60%	7,469,753	7,915,712	106%	60%
2012	7,719,229	8,434,017	109%	63%	7,719,229	8,434,017	109%	63%
2013	7,846,111	8,609,186	110%	66%	7,846,111	8,609,186	110%	66%
2014	7,349,290	10,767,449	147%	70%	7,349,290	10,767,449	147%	70%
2015	6,600,805	11,863,107	180%	75%	6,600,805	11,863,107	180%	75%
2016	6,480,411	10,841,471	167%	78%	6,480,411	10,841,471	167%	78%
2017	6,627,265	9,028,345	136%	81%	6,627,265	9,028,345	136%	81%
2018	6,127,449	8,623,033	141%	83%	6,127,449	8,623,033	141%	83%
2019	5,402,868	7,383,117	137%	85%	5,402,868	7,383,117	137%	85%
2020	5,120,740	8,110,654	158%	87%	5,120,740	8,110,654	158%	87%
Total Actual	179,519,057	155,612,607	87%	87%	179,519,057	155,612,607	87%	87%
Projected								
2021	5,054,526	13,095,852	259%	91%	5,316,007	12,993,704	244%	91%
2022	4,560,121	14,094,926	309%	97%	5,638,652	14,266,780	253%	96%
2023	4,064,427	12,483,113	307%	101%	5,283,739	12,542,804	237%	100%
2024	3,595,569	12,045,465	335%	105%	4,694,373	11,521,286	245%	103%
2025	3,153,910	11,485,504	364%	109%	4,117,744	10,985,693	267%	107%
2026	2,742,027	10,875,010	397%	113%	3,579,990	10,401,766	291%	110%
2027	2,361,723	10,203,834	432%	117%	3,083,465	9,759,796	317%	113%
2028	2,013,563	9,456,902	470%	120%	2,628,907	9,045,369	344%	116%
2029	1,699,167	8,649,528	509%	124%	2,218,432	8,273,129	373%	118%
2030	1,422,632	7,826,365	550%	126%	1,857,388	7,485,787	403%	121%
2031	1,182,737	7,010,879	593%	129%	1,544,181	6,705,789	434%	123%
2032	976,586	6,213,062	636%	131%	1,275,030	5,942,690	466%	125%
2033	800,655	5,458,411	682%	133%	1,045,335	5,220,879	499%	127%
2034	651,610	4,745,403	728%	135%	850,742	4,538,899	534%	128%
2035	526,562	4,081,119	775%	137%	687,479	3,903,522	568%	129%
2036	422,460	3,470,441	821%	138%	551,563	3,319,419	602%	131%
2037	336,504	2,914,029	866%	139%	439,339	2,787,220	634%	132%
2038	266,146	2,414,670	907%	140%	347,480	2,309,592	665%	132%
2039	209,060	1,976,592	945%	141%	272,949	1,890,577	693%	133%
2040	163,204	1,602,183	982%	142%	213,079	1,532,461	719%	134%
2041	126,622	1,287,191	1017%	142%	165,317	1,231,176	745%	134%
2042	97,702	1,023,988	1048%	143%	127,560	979,428	768%	135%
2043	75,003	806,637	1075%	143%	97,924	771,535	788%	135%
2044	57,314	628,198	1096%	143%	74,830	600,861	803%	135%
2045	43,646	483,990	1109%	143%	56,984	462,928	812%	135%
2046	33,160	367,494	1108%	144%	43,294	351,502	812%	135%
2047	25,165	275,751	1096%	144%	32,855	263,752	803%	135%
2048	19,109	205,583	1076%	144%	24,949	196,637	788%	135%
2049	14,542	152,242	1047%	144%	18,986	145,617	767%	136%
2050	11,118	112,185	1009%	144%	14,515	107,303	739%	136%
2051	8,555	82,191	961%	144%	11,170	78,614	704%	136%
2052	6,639	59,681	899%	144%	8,668	57,084	659%	136%
2053	5,211	42,655	819%	144%	6,803	40,799	600%	136%
2054	4,149	30,305	730%	144%	5,417	28,987	535%	136%
2055	3,356	21,794	649%	144%	4,381	20,846	476%	136%
2056	2,754	16,371	594%	144%	3,596	15,658	435%	136%
2057	2,292	13,187	575%	144%	2,993	12,613	421%	136%
2058	1,929	11,221	582%	144%	2,519	10,733	426%	136%
2059	1,633	10,036	614%	144%	2,133	9,599	450%	136%
2060	1,385	8,894	642%	144%	1,809	8,507	470%	136%
2061	1,177	7,895	671%	144%	1,536	7,552	492%	136%
2062	996	7,095	713%	144%	1,300	6,786	522%	136%
2063	835	6,227	746%	144%	1,090	5,956	546%	136%
2064	694	5,337	770%	144%	905	5,105	564%	136%
2065	569	4,557	801%	144%	743	4,358	587%	136%
2066	459	3,834	835%	144%	599	3,667	612%	136%
2067	362	3,152	870%	144%	473	3,015	637%	136%
2068	278	2,474	889%	144%	363	2,366	651%	136%
2069	208	1,817	874%	144%	272	1,738	640%	136%
2070	152	1,295	853%	144%	198	1,239	625%	136%
2071	107	889	827%	144%	140	850	606%	136%
2072	73	572	780%	144%	96	548	572%	136%
2073	49	343	705%	144%	63	328	517%	136%
2074	31	200	640%	144%	41	191	469%	136%
2075	19	113	581%	144%	25	108	425%	136%
2076	12	61	526%	144%	15	59	386%	136%
2077	7	32	478%	144%	9	31	350%	136%
2078	4	16	436%	144%	5	16	319%	136%
2079	2	8	396%	144%	3	8	290%	136%
Total Projected	36,750,507	155,788,800	424%	424%	46,360,455	150,865,260	325%	325%
Total Lifetime	216,269,564	311,401,407	144%	144%	225,879,512	306,477,867	136%	136%
Values Accumulated/Discounted to 12/31/2020 at Maximum Statutory Valuation Interest Rates								
Past	320,962,481	241,605,783	75%	75%	320,962,481	241,605,783	75%	75.3%
Future	29,290,913	114,981,534	393%	393%	36,671,646	111,710,614	305%	304.6%
Lifetime	350,253,394	356,587,317	102%	102%	357,634,127	353,316,397	99%	98.8%